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		WD0241	
	From:	Grady Thrasher, III	
	Sent:	Tuesday, August 12, 2008 9:59 PM	
	To:	NBAFProgramManager	
	Subject:	Emailing: OnlineAthens.com Letters to the Editor 'Smitty' Griffith Let feds, UGA know lab not welcome in Athens 08-12-08	
	Attachments:	OnlineAthens.com Letters to the Editor 'Smitty' Griffith Let feds, UGA know lab not welcome in Athens 08-12-08.htm	
	Dear NBAF Progr	am Manager,	
I LO.L		attached letter from M. Smith Griffith published today in r-Herald among the comments on the NBAF DEIS relative to	
	Thank you.		

Comment No: 1 Issue Code: 25.2 DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

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WD0241

'Smitty' Griffith: Let feds, UGA know lab not welcome in Athens

| Story updated at 6:48 PM on Monday, August 11, 2008

I am a longtime resident of Athens and proud of my history of service to and support for the University of Georgia. But now I am chagrined our beloved university would be a chief proponent and enabler of an environmentally destructive and potentially tragic undertaking adjacent to the State Botanical Garden on South Milledge Avenue.

UGA is enticing the federal Department of Homeland Security with 67 prime pastoral acres next door to the Botanical Garden to bring the world's largest bio-terror laboratory, DHS's proposed National Bio- and Agro-Defense Facility, to Athens

Among the items of information DHS only recently disclosed about the NBAF in a Draft Environmental Impact Statement published in June are the proposed facility's effects on Athens' water (NBAF would use an average of 118,000 gallons per day, with peak use of up to 275,000 gpd in the summer months), air quality, light and noise pollution, biological resources, traffic, waste management and public health and safety.

As you might imagine, the Botanical Garden would be among the first to suffer most from the NBAF being located next door. However, in worst-case scenarios, the entire region could suffer billions in economic losses from a necessary mass slaughter of wildlife and loss of export revenue. Foreign diseases - some fatal to humans - spread by mosquitoes (which will be bred by the thousands in NBAF's "insectary"), could become permanently entrenched in our environment. But, don't take my word for the risks and environmental degradation the NBAF would impose on us; you can hear about it in person Thursday at the Georgia Center for Continuing Education, 1197 S. Lumpkin St. in Athense

DHS will host two public meetings - from 12:30-4:30 p.m. and 6-10 p.m. - to elicit comment from the community regarding NBAF and the impact statement. This may be our last opportunity to let the folks from DHS know in person the NBAF is not welcome in Athens. We can, and should, communicate our disapproval of the NBAF to UGA every day.

I plan to be there to let my voice be heard. I hope a majority of the citizens of our community will join me in saying "No" to NBAF.

M. Smith "Smitty" Griffith

Published in the Athens Banner-Herald on 081208

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WD0308 Grady Thrasher, III From: Sent: Sunday, August 17, 2008 6:13 PM To: NBAFProgramManager Emailing: Executive Order Strengthening Federal Environmental, Energy, and Transportation Management (No. 13423 Subject: Attachments: Executive Order Strengthening Federal Environmental, Energy, and Transportation Management.htm Dear NBAF Program Manager, 1|3.0 | Please add the attached Executive Order No. 13423 to the scoping comments from Athens, GA re NBAF. If DHS contends Executive Order 13423 does not apply to the proposed NBAF, please advise and give reasons. Thank you, Grady Thrasher for FAQinc. "For Athens Quality-of-life"

Comment No: 1 Issue Code: 3.0

DHS notes the commentor's question. DHS will comply with all federal, state, and local regulations and policies.

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WD0308



Home > News & Policies > January 2007

For Immediate Release Office of the Press Secretary January 24, 2007

Executive Order: Strengthening Federal Environmental, Energy, and Transportation Management

By the authority vested in me as President by the Constitution and the laws of the United States of America, and to strengthen the environmental, energy, and transportation management of Federal agencies, it is hereby ordered as follows:

Section 1. Policy. It is the policy of the United States that Federal agencies conduct their environmental, transportation, and energy-related activities under the law in support of their respective missions in an environmentally, economically and fiscally sound, integrated, continuously improving, efficient, and sustainable manner.

Sec. 2. Goals for Agencies. In implementing the policy set forth in section 1 of this order, the head of each agency shall:

(a) improve energy efficiency and reduce greenhouse gas emissions of the agency, through reduction of energy intensity by (i) 3 percent annually through the end of fiscal year 2015, or (ii) 30 percent by the end of fiscal year 2015, relative to the baseline of the agency's energy use in fiscal year 2003;

(b) ensure that (i) at least half of the statutorily required renewable energy consumed by the agency in a fiscal year comes from new renewable sources, and (ii) to the extent feasible, the agency implements renewable energy generation projects on agency property for agency use;

(c) beginning in FY 2008, reduce water consumption intensity, relative to the baseline of the agency's water consumption in fiscal year 2007, through life-cycle cost-effective measures by 2 percent annually through the end of fiscal year 2015 or 16 percent by the end of fiscal year 2015;

(d) require in agency acquisitions of goods and services (i) use of sustainable environmental practices, including acquisition of biobased, environmentally preferable, energy-efficient, waterefficient, and recycled-content products, and (ii) use of paper of at least 30 percent postconsumer fiber content;

(e) ensure that the agency (i) reduces the quantity of toxic and hazardous chemicals and materials acquired, used, or disposed of by the agency, (ii) increases diversion of solid waste as appropriate, and (iii) maintains cost-effective waste prevention and recycling programs in its facilities;

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f) ensure that (i) new construction and major renovation of agency buildings comply with the Guiding Principles for Federal Leadership in High Performance and Sustainable Buildings set forth in the Federal Leadership in High Performance and Sustainable Buildings Memorandum of Understanding (2006), and (ii) 15 percent of the existing Federal capital asset building inventory of the agency as of the end of fiscal year 2015 incorporates the sustainable practices in the Guiding Principles;

(g) ensure that, if the agency operates a fleet of at least 20 motor vehicles, the agency, relative to agency baselines for fiscal year 2005, (i) reduces the fleet's total consumption of petroleum products by 2 percent annually through the end of fiscal year 2015, (ii) increases the total fuel consumption that is non-petroleum-based by 10 percent annually, and (iii) uses plug-in hybrid (PH) vehicles when PIH vehicles are commercially available at a cost reasonably comparable, on the basis of life-cycle cost, to non-PIH vehicles; and

(h) ensure that the agency (i) when acquiring an electronic product to meet its requirements, meets at least 95 percent of those requirements with an Electronic Product Environmental Assessment Tool (EPEAT)-registered electronic product, unless there is no EPEAT standard for such product, (ii) enables the Energy Star feature on agency computers and monitors, (iii) establishes and implements policies to extend the useful life of agency electronic equipment, and (iv) uses environmentally sound practices with respect to disposition of agency electronic equipment that has reached the end of its useful life.

Sec. 3. Duties of Heads of Agencies. In implementing the policy set forth in section 1 of this order, the head of each agency shall:

(a) implement within the agency sustainable practices for (i) energy efficiency, greenhouse gas emissions avoidance or reduction, and petroleum products use reduction, (ii) renewable energy, including bioenergy, (iii) water conservation, (iv) acquisition, (v) pollution and waste prevention and recycling, (vi) reduction or elimination of acquisition and use of toxic or hazardous chemicals, (vii) high performance construction, lease, operation, and maintenance of buildings, (viii) vehicle fleet management, and (ix) electronic equipment management;

(b) implement within the agency environmental management systems (EMS) at all appropriate organizational levels to ensure (i) use of EMS as the primary management approach for addressing environmental aspects of internal agency operations and activities, including environmental aspects of energy and transportation functions, (ii) establishment of agency objectives and targets to ensure implementation of this order, and (iii) collection, analysis, and reporting of information to measure performance in the implementation of this order.

(c) establish within the agency programs for (i) environmental management training, (ii) environmental compliance review and audit, and (iii) leadership awards to recognize outstanding environmental, energy, or transportation management performance in the agency;

(d) within 30 days after the date of this order (i) designate a senior civilian officer of the United States, compensated annually in an amount at or above the amount payable at level IV of the Executive Schedule, to be responsible for implementation of this order within the agency, (ii) report such designation to the Director of the Office of Management and Budget and the Chairman of the Council on Environmental Quality, and (iii) assign the designated official the

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authority and duty to (A) monitor and report to the head of the agency on agency activities to carry out subsections (a) and (b) of this section, and (B) perform such other duties relating to the implementation of this order within the agency as the head of the agency deems appropriate;

(e) ensure that contracts entered into after the date of this order for contractor operation of government-owned facilities or vehicles require the contractor to comply with the provisions of this order with respect to such facilities or vehicles to the same extent as the agency would be required to comply if the agency operated the facilities or vehicles;

(f) ensure that agreements, permits, leases, licenses, or other legally-binding obligations between the agency and a tenant or concessionaire entered into after the date of this order require, to the extent the head of the agency determines appropriate, that the tenant or concessionaire take actions relating to matters within the scope of the contract that facilitate the agency's compliance with this order:

(g) provide reports on agency implementation of this order to the Chairman of the Council on such schedule and in such format as the Chairman of the Council may require; and

(h) provide information and assistance to the Director of the Office of Management and Budget, the Chairman of the Council, and the Federal Environmental Executive.

Sec. 4. Additional Duties of the Chairman of the Council on Environmental Quality. In implementing the policy set forth in section 1 of this order, the Chairman of the Council on Environmental Quality:

(a) (i) shall establish a Steering Committee on Strengthening Federal Environmental, Energy, and Transportation Management to advise the Director of the Office of Management and Budget and the Chairman of the Council on the performance of their functions under this order that shall consist exclusively of (A) the Federal Environmental Executive, who shall chair, convene and preside at meetings of, determine the agenda of, and direct the work of, the Steering Committee, and (B) the senior officials designated under section 3(d)(i) of this order, and (ii) may establish subcommittees of the Steering Committee, to assist the Steering Committee in developing the advice of the Steering Committee on particular subjects;

(b) may, after consultation with the Director of the Office of Management and Budget and the Steering Committee, issue instructions to implement this order, other than instructions within the authority of the Director to issue under section 5 of this order; and

(c) shall administer a presidential leadership award program to recognize exceptional and outstanding environmental, energy, or transportation management performance and excellence in agency efforts to implement this order.

Sec. 5. Duties of the Director of the Office of Management and Budget. In implementing the policy set forth in section 1 of this order, the Director of the Office of Management and Budget shall, after consultation with the Chairman of the Council and the Steering Committee, issue instructions to the heads of agencies concerning:

(a) periodic evaluation of agency implementation of this order;

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- (b) budget and appropriations matters relating to implementation of this order;
- (c) implementation of section 2(d) of this order; and
- (d) amendments of the Federal Acquisition Regulation as necessary to implement this order.

Sec. 6. Duties of the Federal Environmental Executive. A Federal Environmental Executive designated by the President shall head the Office of the Federal Environmental Executive, which shall be maintained in the Environmental Protection Agency for funding and administrative purposes. In implementing the policy set forth in section 1 of this order, the Federal Environmental Executive shall:

- (a) monitor, and advise the Chairman of the Council on, performance by agencies of functions assigned by sections 2 and 3 of this order;
- (b) submit a report to the President, through the Chairman of the Council, not less often than once every 2 years, on the activities of agencies to implement this order; and
- (c) advise the Chairman of the Council on the Chairman's exercise of authority granted by subsection 4(c) of this order.
- Sec. 7. Limitations. (a) This order shall apply to an agency with respect to the activities, personnel, resources, and facilities of the agency that are located within the United States. The head of an agency may provide that this order shall apply in whole or in part with respect to the activities, personnel, resources, and facilities of the agency that are not located within the United States, if the head of the agency determines that such application is in the interest of the United States.
- (b) The head of an agency shall manage activities, personnel, resources, and facilities of the agency that are not located within the United States, and with respect to which the head of the agency has not made a determination under subsection (a) of this section, in a manner consistent with the policy set forth in section 1 of this order to the extent the head of the agency determines practicable.
- Sec. 8. Exemption Authority. (a) The Director of National Intelligence may exempt an intelligence activity of the United States, and related personnel, resources, and facilities, from the provisions of this order, other than this subsection and section 10, to the extent the Director determines necessary to protect intelligence sources and methods from unauthorized disclosure.
- (b) The head of an agency may exempt law enforcement activities of that agency, and related personnel, resources, and facilities, from the provisions of this order, other than this subsection and section 10, to the extent the head of an agency determines necessary to protect undercover operations from unauthorized disclosure.
- (c) (i) The head of an agency may exempt law enforcement, protective, emergency response, or military tactical vehicle fleets of that agency from the provisions of this order, other than this subsection and section 10.

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- (ii) Heads of agencies shall manage fleets to which paragraph (i) of this subsection refers in a manner consistent with the policy set forth in section 1 of this order to the extent they determine practicable.
- (d) The head of an agency may submit to the President, through the Chairman of the Council, a request for an exemption of an agency activity, and related personnel, resources, and facilities, from this order.
- Sec. 9. Definitions. As used in this order:
- (a) "agency" means an executive agency as defined in section 105 of title 5, United States Code, excluding the Government Accountability Office;
- (b) "Chairman of the Council" means the Chairman of the Council on Environmental Quality, including in the Chairman's capacity as Director of the Office of Environmental Quality;
- (c) "Council" means the Council on Environmental Quality;
- (d) "environmental" means environmental aspects of internal agency operations and activities, including those environmental aspects related to energy and transportation functions;
- (e) "greenhouse gases" means carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride;
- (f) "life-cycle cost-effective" means the life-cycle costs of a product, project, or measure are estimated to be equal to or less than the base case (i.e., current or standard practice or product);
- (g) "new renewable sources" means sources of renewable energy placed into service after January 1, 1999;
- (h) "renewable energy" means energy produced by solar, wind, biomass, landfill gas, ocean (including tidal, wave, current and thermal), geothermal, municipal solid waste, or new hydroelectric generation capacity achieved from increased efficiency or additions of new capacity at an existing hydroelectric project;
- (i) "energy intensity" means energy consumption per square foot of building space, including industrial or laboratory facilities;
- (j) "Steering Committee" means the Steering Committee on Strengthening Federal Environmental, Energy, and Transportation Management established under subsection 4(b) of this order:
- (k) "sustainable" means to create and maintain conditions, under which humans and nature can exist in productive harmony, that permit fulfilling the social, economic, and other requirements of present and future generations of Americans; and
- (1) "United States" when used in a geographical sense, means the fifty states, the District of

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Columbia, the Commonwealth of Puerto Rico, Guam, American Samoa, the United States Virgin Islands, and the Northern Mariana Islands, and associated territorial waters and airspace.

Sec. 10. General Provisions. (a) This order shall be implemented in a manner consistent with applicable law and subject to the availability of appropriations.

(b) Nothing in this order shall be construed to impair or otherwise affect the functions of the Director of the Office of Management and Budget relating to budget, administrative, or legislative proposals.

(c) This order is intended only to improve the internal management of the Federal Government and is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by a party against the United States, its departments, agencies, instrumentalities, entities, officers, employees or agents, or any other person.

Sec. 11. Revocations; Conforming Provisions. (a) The following are revoked:

(i) Executive Order 13101 of September 14, 1998;

(ii) Executive Order 13123 of June 3, 1999;

(iii) Executive Order 13134 of August 12, 1999, as amended;

(iv) Executive Order 13148 of April 21, 2000; and

(v) Executive Order 13149 of April 21, 2000.

(b) In light of subsection 317(e) of the National Defense Authorization Act for Fiscal Year 2002 (Public Law 107 107), not later than January I of each year through and including 2010, the Secretary of Defense shall submit to the Senate and the House of Representatives a report regarding progress made toward achieving the energy efficiency goals of the Department of Defense.

(c) Section 3(b)(vi) of Executive Order 13327 of February 4, 2004, is amended by striking "Executive Order 13148 of April 21, 2000" and inserting in lieu thereof "other executive orders".

GEORGE W. BUSH

THE WHITE HOUSE,

January 24, 2007.

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WD0316

From: Grady Thrasher, III

Sent: Monday, August 18, 2008 8:57 AM

o: NBAFProgramManager

Subject: Comments Delivered to DHS at NBAF DEIS Scoping Meeting August 14, 2008

Dear NBAF Program Manager,

Due to the three minute time constraint, only a portion of my comments were orally placed on the record at the afternoon scoping meeting in Athens, Georgia on August 14, 2008. Please add the complete transcript of my prepared comments (below) to the record for the NBAF DEIS. This is part of a series of additional comments you are or will be receiving during this scoping period that are intended to clearly show that the unique and distinctive site on S. Milledge Ave. at Whitehall is not suitable for a huge and invasive development such as the proposed NBAF. *The DEIS failed to recognize the unique and distinctive nature of the landscape* and the value of the S. Milledge Ave. corridor as one of the most unique outdoor recreation areas and vistas available to Athens residents. This S. Milledge corridor includes the State Botanical Garden, with its miles of natural walking trails (many of which would be adversely affected by the NBAF perimeter fencing and lighting), the Equestrian Center, the Women's Athletic field, and the Intramural Sports fields (now being developed right across the street from the proposed NBAF site).

Thank you.

Comments Delivered to DHS at NBAF DEIS Scoping Meeting by Grady Thrasher Co-founder FAQinc. "For Athens Quality-of-life" Athens, Georgia August 14, 2008

As has been asked before by disinterested news reporters from cities around our country whose governing bodies are not engaged in the current frenzied efforts by five states to induce the Department of Homeland Security to place the would-be world's largest and potentially deadliest bio-terror pathogen research facility in the middle of one of their communities:

WHY WOULD THEY?

Comment No: 1 Issue Code: 25.2

DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

Comment No: 2 Issue Code: 6.2

DHS notes the commentor's concern and acknowledges the proximity of the South Milledge Avenue Site to the State Botanical Garden. As described in Section 3.8.3.1.1 of the NBAF EIS, 80% of the site consists of pasture, and the adjacent lands consist of forested lands and small, perennial headwater streams. Approximately 30 acres of open pasture, 0.2 acres of forested habitat, and less than 0.1 acres of wetlands would be affected by the NBAF. However, construction and normal operations of the NBAF would have no direct impact on the State Botanical Garden as indicated in Sections 3.8.3.2 and 3.8.3.3. Only minimal indirect effects would occur from operations due to increases in light and noise.

Comment No: 3 Issue Code: 7.2

DHS notes the commentor's statement. The visual nature and the effects of the NBAF at the South Milledge Avenue Site are described in Section 3.2.3 of the NBAF EIS. DHS recognizes that the NBAF would be a distinctive visible feature and would alter the viewshed of the area.

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4121

Why would any responsible state or city official welcome such an environmentally degrading, invasive and catastrophically risky facility as NBAF into the heart of a community? More on the point, why would our Mayor and some, if not all, of our Athens/Clarke County Commissioners roll out the welcome mat for ensured environmental destruction adjacent to our State Botanical Garden before any other credible information was available about NBAF? More astounding, why would our Mayor and many Commissioners remain proudly steadfast in their folly even after being exposed to real and astonishing information regarding the potentially catastrophic risks to our community's public health, safety and economy, information provided first from the respected Government Accountability Office in May, and now in DHS's own Draft Environmental Impact Statement?

Why would any responsible University of Georgia administrator offer 67 unique and distinctive acres of irreplaceable land next to our Botanical Garden and give other incentives to DHS to entice it to impose its proposed NBAF there, with full knowledge of the certainty of the environmental degradation and ecological disaster that irreversibly will befall and forever sully the unique and distinctive character of that swath of landscape on South Milledge Avenue that has been a public visual and recreational asset of our community for generations?

Why would any responsible government agency, particularly one dedicated to protecting communities from disaster, seek to place a potential disaster of catastrophic scope in the middle of any populated community? Why would DHS believe the construction and operation of a biocontainment enclosure larger than any ever attempted in the world, to house deadly pathogens and herds of large animals infected with deadly pathogens, some of which are transmittable to and fatal to humans, in close proximity to our places of recreation and communing with Nature, close to our neighborhoods, schools, places of worship and source of drinking water, is a good idea?

Why would DHS doggedly pursue the bringing of the highly virulent Foot and Mouth Disease virus (which do not sicken humans, but for which humans and pets can act as vectors) on the mainland U.S. when it is known (and disclosed in the DEIS) that a release of the virus by NBAF could destroy our livestock industry and require "depopulation" (a bureaucratic term for "killing" of much of our area wildlife? And why would DHS want to do this in the middle of a unique, distinctive and invaluable key recreational and wildlife sanctuary in the middle of our community—close to schools, neighborhoods and places of worship?

5|15.2 | WHY?

The answers that have emerged are: Money, Perceived Prestige and (worst of all) Convenience.

Money Interestingly, the money issue goes both ways. DHS, like a cash-strapped startup company, is looking for free land, free infrastructure and free utilities, all to be paid for by local taxpayers (while, of course, those same local taxpayers, along with every other taxpayer in our country foots the rest of the \$451 million construction cost).

The ACC government expects NBAF to be an engine of economic growth and tax revenue, while the same government looks the other way at the risks of catastrophic economic loss, possible public health disaster and the certainty of environmental degradation and ecological destruction.

Comment No: 4 Issue Code: 2.0

DHS notes the commentor's concern. DHS prepared the NBAF EIS in accordance with the provisions of NEPA (42 U.S.C. 4321 et seq.) and CEQ's regulations for implementing NEPA (40 CFR 1500 et seq.). The primary objective of the EIS is to evaluate the environmental impacts of the no action and site alternatives for locating, constructing and operating the NBAF. As summarized in Section 3.1 of the NBAF EIS, DHS analyzed each environmental resource area in a consistent manner across all the alternatives to allow for a fair comparison among the alternatives. The decision on whether to build the NBAF will be made based on the following factors: 1) analyses from the EIS and support documents; 2) the four evaluation criteria discussed in section 2.3.1; 3) applicable federal, state, and local laws and regulatory requirements; 4) consultation requirements among the federal, state, and local agencies, as well as federally recognized American Indian Nations; 5) policy considerations; and 6) public comment.

Comment No: 5 Issue Code: 15.2

DHS notes the commentor's concern. Funding for the design, construction, and operations for the NBAF will come from the Federal Government. Proposals for offsets to the site infrastructure (part of the construction costs) were requested by the Federal government. The decision as to what to offer (land donation, funding, other assets) is solely at the discretion of the consortium, state and local officials as part of the consortium bid site package. The amount of funding and how the funding is paid for (bonds, taxes, etc) is determined by the state and local government officials and not the decision of the Federal government. The risk of an accidental release of a pathogen is low, but DHS acknowledges that the the consequence is high for all site alternatives. Appendix D and Section 3.10.9 of the NBAF EIS presents estimates of the possible economic effect of an accidental release. The risks and associated potential effects to human health and safety were evaluated in Section 3.14 of the NBAF EIS. The economic effects of the NBAF at the South Milledge Avenue Site are included in Section 3.10.3. Labor income during construction is projected at approximately \$150 million while operation of the NBAF would generate approximately \$28 million in wages annually.

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5 cont. UGA, the local engine driving this ill-considered and potentially tragic boondoggle, has its eyes on federal grant money for research "collaborative" with that done at NBAF.

<u>Prestige</u> Apparently both UGA and the ACC government think NBAF will enhance the images of Athens and the University. Many others say it will do the opposite—peg Athens as the new "Plum Island" of grim legend.

Convenience This is the most startling excuse offered by UGA to the question of "why would you destroy the character of an entire area of two that is now characterized as a unique/distinctive pristine model of natural beauty anchored by the Botanical Garden on one end and Whitehall Forest on the other, an area devoted to outdoor recreation, equestrian activities and ecological and environmental protection and splendor?" The answer was "It was there, we owned it, and we were under a tight deadline to come up with an alternative site to include as part of our proposal to DHS". The other excuse (and perhaps the one most attractive to DHS) is "We wanted the location of NBAF to be convenient to our own research facilities".

So, for speculative prospects of money, questionable prestige, if any, and perceived convenience, our city government and our University, happy to let the people assume the risks of potential catastrophe and endure the certainty of environmental degradation and ecological disruption, are begging Homeland Security to degrade our environment, undermine our quality of life, and place their gigantic and potentially catastrophic threat to our health, safety and economy—right in the middle of our beloved community.

This is our question to each of you: The Department of Homeland Security, the Athens Clarke County Mayor and Commissioners, the Administrators of UGA, and all the "Stakeholders" in the Georgia Consortium:

Do you have no shame?

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WD0323

From: Grady Thrasher, III

Sent: Monday, August 18, 2008 1:16 PM

To: Phillip Ingram; NBAFProgramManager

Subject: FW: Our own worst bioenemy - LA Times

1|2.0 Please include the following newspaper article in the scoping comments regarding the NBAF DEIS relative to the Athens, GA location.

Thank you.

----Original Message----

From: Matt DeGennaro

Sent: Monday, August 18, 2008 1:01 PM

To: Grady Thrasher, III; Nancy zechella

Subject: Our own worst bioenemy - LA Times

...you may have already seen this, but it's good "big picture" stuff..."

http://www.latimes.com/news/opinion/la-oe-orent13-2008aug13,0,1045104.story From the Los Angeles Times

Our own worst bioenemy

The U.S. bioweapons program has grown so large that it has become a threat to Americans. By Wendy Orent

August 13, 2008

Whatever you can say about the Soviet bioweapons scientists," a Bush administration official once told me, "they never killed anyone."

We can't say the same about our bioweapons scientists. Someone, most likely Bruce Ivins, at the U.S. Army Medical Research Institute of Infectious Diseases at Ft. Detrick, Md., turned powdered anthrax spores into a deadly weapon. It's ironic that the Soviet scientists were making offensive weapons. Our people, since 1969, have worked strictly to defend us.

One of those defenders killed five people, sickened 17 others and plunged the nation into hysteria for weeks in the fall of 2001. After a seven-year investigation by the FBI, the source of the deadly anthrax strain has been identified — our own biodefense program at Ft. Detrick. That is the real legacy of the FBI investigation.

Since the anthrax-laced letters were mailed in September and October of 2001, U.S. biodefense has blown up out of all proportion to any rational assessment of the bioweapons threat. Earlier this year, an article in the journal Biosecurity and Bioterrorism, analyzing government biodefense spending from 2001 to 2008, stated that \$49.66 billion has been allocated for civilian biodefense. According to microbiologist and longtime biodefense critic Richard Ebright of

Comment No: 1 Issue Code: 2.0

DHS notes the information submitted by the commentor.

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Rutgers University, actual spending is even higher, amounting to \$57 billion.

In 2005, he and 757 other microbiologists sent a stinging open letter to Elias Zerhouni, director of the National Institutes of Health, protesting the government's preoccupation with "priority pathogens" — germs such as anthrax that could be used in a bioweapons attack. But Zerhouni and Anthony Fauci, director of the National Institute of Allergy and Infectious Diseases, would have none of it. In a letter published in the journal Science, they disagreed: "The United States has experienced an anthrax attack, and security experts repeatedly express concern that future attacks with biological weapons are likely, if not inevitable."

But we didn't actually experience an anthrax attack. The whole incident amounted to a snake eating its own tail. No ingenious biowarrior from Al Qaeda sent the lethal envelopes through the U.S. postal system. An American scientist did. The FBI and its genetic analyses leave no doubt: Though 16 laboratories had access to the "Ames strain" of anthrax used in the letters, only the samples that came from Ivins' laboratory at Ft. Detrick matched the genetic fingerprint of the attack strain.

In the sorry aftermath of the anthrax investigation, it's clear that the National Institutes of Health and the Centers for Disease Control and Prevention have to rethink the priority-pathogens list, which includes anthrax, smallpox, plague, tularemia, Ebola and other germs that rarely, if ever, threaten American lives. It's the "non-defense-related" germs that are killing us. Randall Wolcott of the Southwest Regional Wound Care Center points out that 500,000 Americans a year die of biofilm infections -- such as diabetic ulcers -- that are almost impossible to treat by conventional means. That's almost twice as many as die of cancer.

According to the CDC, infections caused by methicillin-sensitive *Staphylococcus aureus*, or MRSA, kill 19,000 people a year. Still, staph itself isn't considered a priority pathogen, despite the emergence of highly resistant and increasingly virulent strains. Only one of 40 staph toxins is on the priority list.

There's another problem created by the priority-pathogens list. The ballooning of the biodefense program, according to Ebright, means that about 14,000 individuals are now considered qualified to work with priority pathogens.

It hasn't always been easy to find qualified people for this research. In the days when the FBI was pursuing former "person of interest" — and now exonerated — Steven J. Hatfill, one senior government scientist said of Hatfill's background, "You take what you can get — not many people with his abilities show up very often." So where do 14,000 suddenly qualified biodefense experts come from? And how can they be vetted? As biodefense expert Leonard Cole, author of "The Anthrax Letters," told me: "There are 15,000 to 16,000 people now working in labs on select agents — that's many more possibilities of another bizarre individual doing illicit work."

The lesson of the anthrax letters isn't that we're in danger of a bioweapons attack from terrorists. It's that U.S. biodefense itself has become a threat: We have met the enemy -- and it is us.

The next administration should pull the plug on the biodefense excesses of the Bush

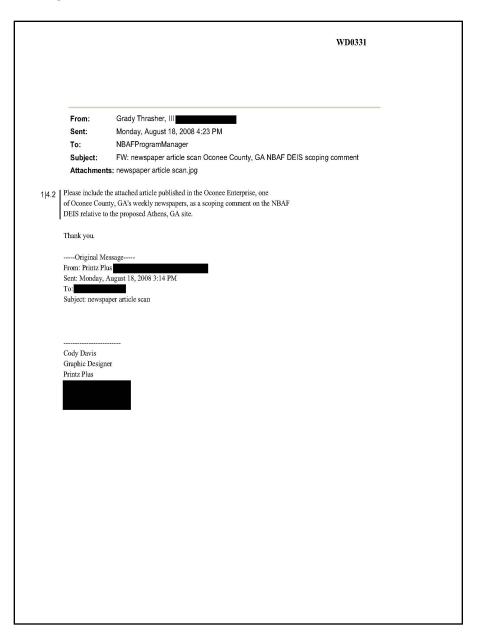
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WD0323	
administration and put most of the thousands of microbiologists to work on the germs we really need to worry about.	
Wendy Orent is the author of "Plague: The Mysterious Past and Terrifying Future of the World's Most Dangerous Disease."	

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Comment No: 1 Issue Code: 4.2 DHS notes the information submitted by the commentor.

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WD0331



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WD0853

From: Grady Thrasher, III

Sent: Monday, August 25, 2008 9:12 PM NBAFProgramManager

Subject: NBAF DEIS potential for litigation if sited on S. Milledge Ave. in Athens, GA

Dear Mr. Johnson,

To:

1|5.2

21 13.2

As we approach the midnight deadline for commenting on the NBAF DEIS, I would like to make a final comment on behalf of FAQinc. "For Athens Quality-of-life", leader of the community opposition to NBAF in Athens.

As you will see from the comments from our attorneys and experts on the legally deficient DEIS (which you have already received or will soon receive this evening), the opposition in Athens is completely serious about protecting our community and the environment and ecology around the proposed site. Although the costs of litigation are significant, our committment to keep NBAF away from Athens is unwaivering. My wife and I, along with her family and many of our supporters, make substantial financial contributions to UGA annually. We have determined that such funds could better be used, if required, to stop NBAF from degrading the environment and destroying the ecology of that unique and distinctive property adjacent to our State Botanical Garden and putting our entire community at risk. I mention our collective financial resources not to boast, but to assure you that the potential for protracted litigation is real and that the costs would be paid from funds that would otherwise be donated to UGA. Thus, UGA would, in effect, be paying our litigation costs. Such are the ironies that can result from ill-considered, high community impact decisions made by our institutions without community participation or acceptance.

cont. \mid 1 | 5.2 \mid Please understand that the S. Milledge site is perhaps the worst, most problematic location among the alternatives available for NBAF. If necessary, our position will be confirmed by court action.

Sincerely,

Grady Thrasher for FAQinc. "For Athens Quality-of-life" Comment No: 1 Issue Code: 5.2

DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

Comment No: 2 Issue Code: 13.2

DHS notes the commentor's concern regarding the proximity of the South Milledge Avenue Site to the State Botanical Garden. As indicated in Sections 3.8.3.2 and 3.8.3.3 of the NBAF EIS, construction and normal operations of the NBAF would have no direct impact on the State Botanical Garden. The NBAF would affect primarily pasture areas that have low wildlife habitat value due to their disturbed condition, lack of native vegetation, and lack of wildlife food and cover. The forested portion of the NBAF site along the Oconee River is a high-value riparian wildlife corridor that connects the State Botanical Garden with Whitehall Forest. However, impacts to the forested riparian area would be minor (0.2 acre), and these impacts would occur within the existing pasture fence-line in areas that have been disturbed by grazing. Construction would occur primarily on disturbed pasture areas, and the high value forested riparian corridor would be retained. Therefore, the NBAF have minimal effects on wildlife and ecology of the State Botanical Garden.

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	WD0337	Comment No: 1 DHS notes the inform
From:	Grady Thrasher, III	
Sent:	Monday, August 18, 2008 7:41 PM	
To:	NBAFProgramManager	
Subject:	Emailing: OnlineAthens.com Letters to the Editor Jane Wellport Information on NBAF simply is inadequate 08-17-08	
Attachment	s: OnlineAthens.com Letters to the Editor Jane Wellport Information on NBAF simply is inadequate 08-17-08.htm	
Please add the at newspaper to the	trached letter published in the Athens Bamner-Herald escoping comments from Athens, GA re the NBAF DEIS.	
Thank you.		

Issue Code: 4.2 nation submitted by the commentor.

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WD0337

Jane Wellport: Information on NBAF simply is inadequate

| Story updated at 6:45 PM on Sunday, August 17, 2008

As a resident of Athens, I'm opposed to construction of the National Bio- and Agro-Defense Facility here, in light of the information available on the potential hazards it poses.

The full scope of the risks involved in having such a research facility here are not really completely understood, or at least have not been shared with residents.

The consequences of disease transmission by infectious mosquitoes, along with what steps would be taken in case of such transmission to both human and animal populations, have not been addressed. In addition, the method(s) of disposal of research animal carcasses has not been disclosed, along with the impact of such disposal on local water and air quality. If a "worst-case scenario" were to occur, what specific steps would be taken to evacuate the residents and what would the cost be?

The inadequacy of the information provided is not acceptable. All of the aspects listed are extremely worrisome and cause for rejecting the building of this facility here. Many residents have expressed concern and opposition to this project being carried out in our community, and we hope that our voices will be heard and respected and that this facility will be relocated to a more secure setting.

Jane Wellport

Published in the Athens Banner-Herald on 081708

2-2366 December 2008

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WD0464 From: Grady Thrasher, III Sent: Thursday, August 21, 2008 6:07 PM lynn@athensclarkecountyga.gov; davison@athensclarkecountyga.gov; lowry@athensclarkecountyga.gov; dodson@athensclarkecountyga.gov; hoard@athensclarkecountyga.gov; Mayor@Athensclarkecounty. Com Margaret Hale; Don Norris; Jim Luke; Chuck Horton; Melvin Davis; Subject: FW: Atty. General Blumenthal quotes Sounds like he is talking about the proposed S. Milledge Ave. site in Athens. 1| 27.0 -----Original Message--From: Matt DeGennaro Sent: Thursday, August 21, 2008 5:43 PM To: Grady Thrasher, III; Kathy Prescott; Nancy zechella Subject: Must read - Blumenthal quotes Check this out: AG disparages Plum Island option Today Attorney General Richard Blumenthal has filed formal comments with the U.S. Department of Homeland Security, outlining alleged inadequacies in a draft environmental impact statement on a proposed federal National Bio and Agro-Defense Facility on Plum Island. Plum Island, eight miles off the Connecticut shore, is one of six sites targeted by the federal government for a proposed Level 4 NBAF, the highest security designation, that would allow study of some of the deadliest biological threats to humans. Plum Island now operates as a Level 3 facility involving only animal-to-animal pathogens. Blumenthal said the federal government's draft environmental impact statement is "profoundly deficient, and legally insufficient," failing to fully consider the overwhelming risks of this facility, in violation of the National Environmental Policy Act. Blumenthal said Plum Island should be immediately removed from the list of considered sites. "Although Plum Island has long hosted research into animal disease, the new facility would take the public health threat literally to a new level," Blumenthal said in a statement. "The environmental security risks are intolerable in an area so densely populated, heavily traveled and environmentally valued. The threat of accident or attack is hardly hypothetical or speculative, as recent experience has taught to our sorrow. These dangers are real and substantial, and have not been adequately considered."

Comment No: 1 Issue Code: 27.0 DHS notes the information submitted by the commentor.

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WD0352

From: Grady Thrasher, III

Sent: Tuesday, August 19, 2008 10:37 AM

To: NBAFProgramManager

Subject: To all members and supporters of FAQinc "For Athens Quality-of-life"

Dear NBAF Program Manager,

1|25.2 Please add the following to the record of Athens, GA comments to the NBAF DEIS. Thank you.

> To all members and supporters of FAQinc. "For Athens Quality-of-life"

> > August 19, 2008

Thank you for your attendance and participation in the "final" scoping meetings held by the Department of Homeland Security in Athens last Thursday. Although many sponsors of NBAF—primarily UGA research employees and financially interested members of the "Georgia Consortium—were there mostly to repeat their previously-heard cheerleading for NBAF, the people of the community, in equal or greater numbers, voiced clear and unequivocal opposition.

How this giant, invasive and environmentally degrading facility—carrying risks of catastrophic proportions—imposed in the middle of our community could be considered a good idea by UGA and our ACC government is a daunting question. Add that one of the most uniquely distinctive and beautiful undeveloped vistas remaining in Athens/Clarke County, next to our State Botanical Garden, is being so easily offered by UGA and its enablers to DHS for NBAF adds community insult to community injury.

The voices of the people heard at the meeting were more relevant than the repeated cheerleading of financially interested promoters. We, the people of the community, spoke to NBAF's adverse effects on our environment, wildlife, the ecology of the Oconee River and the State Botanical Garden. We spoke of drought and water restrictions. We spoke of impact on air quality, infrastructure, traffic and quality-of-life. We spoke of site-specific geologic obstacles to construction, such as bedrock requiring blasting and how runoff and erosion would foul our fragile river and source of drinking water. We brought up the risks NBAF posed to the community's public health, safety and the region's economy, all as presented in the DEIS (requiring reading past the misleading Executive Summary), all matters to which DHS sought public input; all matters of dire importance to our community—but apparently deemed not so important by UGA and the ACC government.

Comment No: 1 Issue Code: 25.2

DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

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IMPORTANT: If you did not have a chance to speak up at the meetings, and if you haven't communicated your opposition to NBAF to DHS, you have until next week, August 25 to make your voice heard. You can send your comments to DHS by telephone, fax, email or regular mail. DHS's email address is nbafprogrammanager@dhs.gov. FAQ's website www.athensfaq.org has more information about how to communicate your concerns. Don't wait. Please act today.

Thank you Athens-area citizens for letting DHS know where the *real* community stands:

NO TO NBAF!

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From: Grady Thrasher, III Sent: Monday, August 18, 2008 7:47 PM To: NBAFProgramManager Subject: Emailing: OnlineAthens.com Letters to the Editor Prescott, Thrasher Mayor should reexamine her commitment to NBAF 08-13-08 Attachments: OnlineAthens.com Letters to the Editor Prescott, Thrasher Mayor should re-examine her commitment to NBAF 08-13-08.htm Please add the attached letter published in the Athens Bamer-Herald on August 13, 2008 to the scoping comments from Athens, GA re the NBAF DEIS. Thank you.	
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August 13, 2008 to the scoping comments from Athens, GA re the NBAF DEIS.	
Thank you.	

Comment No: 1 Issue Code: 25.2 DHS notes the information submitted by the commentor.

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WD0373

Prescott, Thrasher: Mayor should re-examine her commitment to NBAF

| Story updated at 8:03 PM on Wednesday, August 13, 2008

The following is an open letter to Athens-Clarke County Mayor Heidi Davison:

The tide has turned against the special interests and in favor of the people of the Athens area.

The truly informed people of Athens-Clarke and Oconee counties are rejecting the nightmare the National Bio- and Agro-Defense Facility would be on South Milledge Avenue next to the Botanical Garden - a nightmare that you, as our mayor, invited the Department of Homeland Security to impose on our community.

Your action apparently was based on now-discredited propaganda from DHS and the University of Georgia, and was taken without citizen input. At the time, there was very little substantive understanding by you or anyone in the Athens-Clarke County government of the full scope of the problems, risks and costs involved with the NBAF.

Even if you acted in good faith at the time, your letter to DHS stating, "We stand ready to accept this facility and are prepared to assist in whatever way we possibly can," now can only be seen, based on credible examination, as ill-considered and irresponsible.

We ask you as our friend, neighbor and fellow Athenian, to re-examine your earlier actions and reject the NBAF in light of the facts revealed by the Government Accountability Office and the DHS's Draft Environmental Impact Statement. Saying "no" to the NBAF would protect, rather than exploit, Athens' unique quality of life.

We look forward to seeing you at the DHS's public meetings Thursday.

We hope you've had a chance to read the full DEIS. Please don't be lulled into complacency by the misleading executive summary or swayed by the proponents of the NBAF.

Kathy Prescott

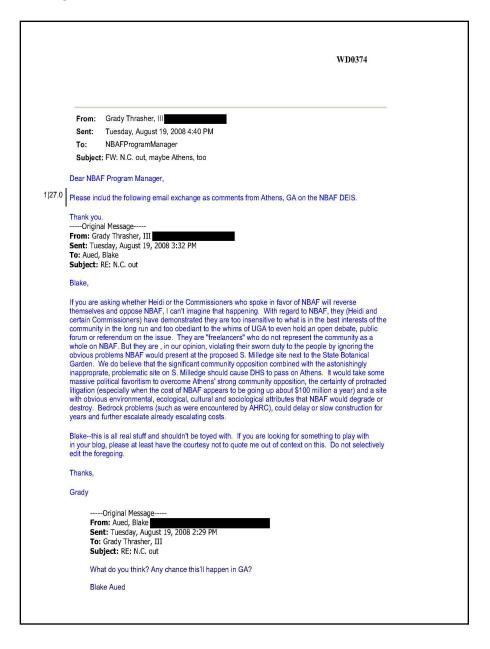
Grady Thrasher

 $\textit{Editor's note: Prescott and Thrasher are co-founders of the local nonprofit organization For Athens \ Quality-of-life.}$

Published in the Athens Banner-Herald on 081308

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Comment No: 1 Issue Code: 27.0 DHS notes the information submitted by the commentor.

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the project among local officials.

"There is enough concern now that the local politicians have. Most of them were enthusiastic in their support a year ago. Now they either have become neutral, or have come out against most recently and said they do oppose it, because they feel their questions have not been answered thoroughly" in the Department of Homeland Security's draft environmental impact statement describing the project, released in June, said Dave Green, a spokesman for the North Carolina Consortium for the National Bio and Agro-Defense Facility.

"They were expecting to see more definitive information related to their concerns," he added. "From their perspective, the EIS didn't address the concerns to the degree that they were hoping for."

Green said his group still believes the NBAF would benefit public health, as well as the US livestock industry and the economy of Granville County, where the project would be located in North Carolina.

Asked if the political backpedaling would hurt North Carolina's chances of being selected by the DHS, Green replied: "I think it's fair enough to say so."

The homeland security department is expected to reach a final decision by the end of the year. Construction is set to start in 2010 and stretch four years.

Green, who is also a spokesman for NC State University's College of Veterinary Medicine, spoke five days after the consortium issued a <u>statement</u> on its web site that it "continues to evaluate its position following renewed expressions of concern" about the project's draft environmental impact statement.

"The consortium remains concerned by claims from citizens and elected officials that DHS has not adequately addressed their concerns," according to the three-paragraph statement, issued Aug. 8 by Warwick Arden, dean of NC State's CVM. "NCC-NBAF continues to urge DHS to address community concerns and the consortium will closely monitor the relationship between DHS and the constituent communities. The views of local citizens and guidance of elected officials will determine whether North Carolina will proceed with its bid."

Homeland Security spokeswoman Amy Kudwa insisted to BRN last week that the agency has not ruled out North Carolina as the site of the biolab, but stressed that opposition to NBAF has not gone unnoticed by DHS.

"In the ideal situation, we want to be somewhere where we're wanted," Kudwa said, "And so public support, and local elected official support is something that is important to the considerations as they're ongoing."

Kudwa added that DHS will consider community acceptance as it makes its decision. Other criteria include proximity to existing research capabilities, proximity to a workforce, and feasibility of site acquisition, construction, and operations.

She added that DHS will not give extra weight to local acceptance or opposition, instead evaluating the proposal of each state individually.

North Carolina is among five states whose proposals to host the biolab remain under DHS consideration. The other four states are Georgia, Kansas, Mississippi, and Texas. DHS is also weighing a sixth option, retaining the existing Plum Island Animal Disease Center in New York.

An official familiar with DHS thinking, who spoke to *BRN* on condition of anonymity and was not authorized to discuss the review process publicly, said the agency anticipated

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opposition to its plan when it expanded to five from three the number of states on its short list for the NBAF sites. That way, the official said, homeland security could choose between several good proposals rather than be limited to choosing one state by default.

"As a matter of prudence, we thought it was probably better to expand that list a little bit, because we might have a couple of sites that de-select themselves," the official said.

'We Need This Facility'

The NBAF would consist of 500,000 to 520,000 square feet housed in two laboratory buildings and four outbuildings. One building would serve as the primary research facility containing biosafety laboratories rated 2, 3E, 3A, and the highest rating of 4, plus support spaces. The second building would serve as a laboratory for small-scale vaccine and reagent production.

DHS and the US Department of Agriculture have contended they need the biolab because Plum Island, which was built in the 1950s, is too small and increasingly too outdated to carry out the volume and quantity of testing needed to protect the nation's \$1 trillion agricultural industry from the potentially catastrophic results of a bioterror attack on livestock.

"To expand and grow our research capabilities into the 21st century, and to have the diagnostic capability that we need to have in the US in order to protect agriculture, we need this facility," Kudwa said.

In North Carolina, the biolab would rise within 195 undeveloped acres at the Granville County portion of the 4,035-acre North Carolina Department of Agriculture Umstead Research Farm in Butner.

"They couldn't have picked a worse location for the project. The factor of risk is just too high. The people here don't want it at all." Among the selling points promoted by biolab supporters are the project's location about a 20-minute drive northwest of Raleigh and Research Triangle Park, and a slightly longer drive to the Triangle region anchored by the cities of Greensboro, Winston-Salem, and High Point.

Those arguments persuaded officials in Butner, its county of Granville, and several surrounding counties to pass resolutions endorsing NBAF last year.

Over the past few months, however, the county commissions of Granville and Durham, the cities of Raleigh, Durham, and Creedmoor, the town of Stem, state Sen. Doug Berger (D-Franklin County), and US Rep. Brad Miller (D-Raleigh) have joined the opposition to NBAF — in some cases after reversing previous support for the project. Durham's board of commissioners was among the most recent to join the anti-biolab effort, voting 4-1 on Aug. 11 to oppose the project. The board has not previously voted on the project.

Another vote of no confidence in NBAF came late last month, when the state-funded North Carolina Biotechnology Center rejected a \$262,248 grant from the Golden Leaf Foundation toward promoting the project, in part through advertisements and public speakers.

"Taken as a whole, the proposed agreement vests Golden Leaf with such involvement and decision making power over the details of the project that it ceases to be a grant supporting independent, objective work and analysis," Norris tolson, the biotech center's president and CEO, said in a July 29 letter to Golden Leaf President Valeria Lee.

The reversals have been welcomed by the Granville Nonviolent Action Team, also known

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as GNAT, which reactivated itself last September to lead the opposition to NBAF's North Carolina proposal.

GNAT member Ron Howell, a senior reliability engineer and architect, told *BRN* last week his group of "several hundred" members had met directly with elected officials over several months urging them to oppose the biolab.

"We talked directly with them, and we had very good conversations with many of them," Howell said in an interview. "It turned out they were looking at just the dollars up front. They changed their own minds, for the most part, when they saw the risk. They saw what it could do, measured in billions of dollars, if even a small event happened here."

Smaller communities, he said, shared concerns that their public safety budgets would have to increase to prepare for any incidents at the biolab.

GNAT backed up those requests with some people-power, namely hundreds of angry residents the group turned out to attend public hearings on NBAF, and some publicly reported promises by members to get themselves arrested should construction ever begin on the project.

GNAT and other opponents have contended the biolab should not be built at the Umstead Research Farm, a former US Army testing range, because of the potential risk for an escape of pathogens into the surrounding community, as well as into the watershed encompassing the Neuse River basin, Holt Lake, and Falls Lake, which serves Butner and communities stretching into the city of Raleigh.

In addition, the site is bounded on one side by the C.A. Dillon Youth Development Center, and near several residential state and federal facilities reported to have more than 7,000 residents. Among those numbers are those living at the state-run Umstead Correctional Center, a minimum security facility, a National Guard outpost; and a state-run psychiatric facility, John Umstead Hospital.

"They couldn't have picked a worse location for the project. The factor of risk is just too high," Howell said. The people here don't want it at all. The politicians are now against it. Everyone's coming out against it. It's an incredibly dangerous laboratory, and they know that now. A little education goes a long way. That lab is going to have issues and failures. Are you willing to bet your life on it?"

Before retreating this month, the North Carolina consortium argued that the biolab would not harm the local watershed because the site lay outside of 100- and 500-year flood zones, and is not prone to earthquakes or other geologic events.

"Natural disasters, then, pose little risk to the facility's operations," the consortium stated on its web site. "All waste from the lab will be pretreated and decontaminated, just as has been done successfully with CDC in Atlanta for many decades."

Howell, like many other biolab opponents, has cited arguments questioning the merit of any NBAF proposal, not just the one in North Carolina. He faulted the absence of detailed design drawings for the facility in the DEIS, contending it was one key reason why his group considers the draft environmental report incomplete.

Jay Cohen, the DHS undersecretary who oversees its Science & Technology Directorate, testified to Congress last April that work is planned for federal fiscal year 2009, which starts Oct. 1, using part of the \$146.9 million in funding sought by DHS.

The following month a report by the US General Accountability Office questioned whether one particular research area the biolab is designed to help address, namely foot-and-mouth

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disease, can be safely researched on the US mainland instead of at an island facility like Plum Island.

NBAF opponents say a mainland lab would increase the chances of the disease spreading to livestock, and cite the absence of any such outbreak since 1929 under the island-based research policy. In testimony to Congress in May, not posted on DHS' website but quoted identically in numerous news outlets, Cohen said that a risk indeed exists. "While there is always a risk of human error ... the redundancies built into modern research laboratory designs and the latest biosecurity and containment systems ... effectively minimizes these risks."

At a May 22 hearing of the US House Committee on Energy and Commerce, the testimony by Cohen, a retired US Navy rear admiral, drew fire from the Michigan Democrat who chairs the panel, John Dingell, as well as from GAO representatives, who said DHS based its NBAF policy on a flawed 2002 study.

"The DHS proposal to move live foot-and-mouth virus to the mainland without fully exploring the dangers is utterly baffling," Dingell said in a statement issued by his office the day of the hearing.

Kudwa, the DHS spokesperson, insisted the agency's consultants could build the biolab and operate it without harm to human or animal health. "Safety is absolutely paramount as we undertake this project," she said.

James Lumpkins, the chairman of Granville County's Board of Commissioners, told BRN last week that DHS had dragged its feet on answering county officials' specific questions about the proposed biolab, prompting his board to withdraw its support from the project.

Lumpkins said the board had many of the same concerns about the effects of an escape of pathogens from NBAF as GNAT expressed.

"We pleaded with homeland security for days and weeks and months to come and answer the questions that the people had. They refused to do that for along, long time. They procrastinated until the whole situation got into turmoil, and I guess that's what it's in right now," Lumpkin said in an interview.

By the time DHS reversed itself and returned to Granville County, Lumpkins said, "very few people felt at ease to even go up and support it at the podium. I don't think in good conscience that [supporters] wanted to get involved in the project. It doesn't really make any difference in my opinion what Homeland Security says now. [Opponents] aren't going to back off. They're not going to be convinced.

"I have very mixed feelings about the situation," he added.

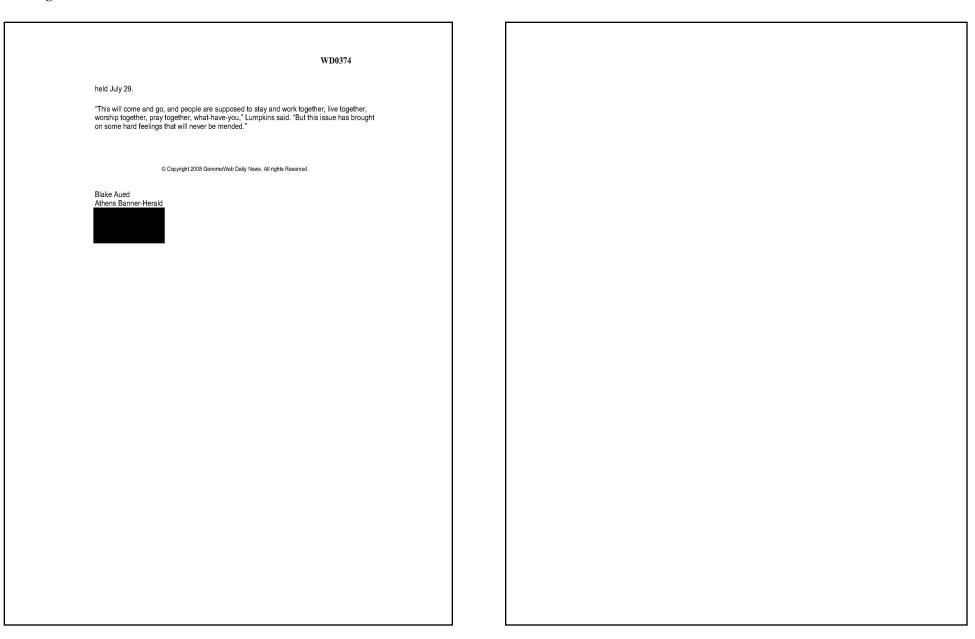
Kudwa said her agency attempted to address Granville County's responsiveness concerns, as it has similar concerns in Georgia, in part by holding three public hearings on the DEIS instead of the two required by the National Environmental Policy Act. In addition to the required hearings on DEIS areas of study or "scoping," and on the report itself, DHS offered to host a second hearing in all five communities under consideration.

"Not every community took us up on the offer," though North Carolina and Georgia did, she said.

Granville County's backing away from the biolab, Lumpkin said, should not be interpreted as a sign of support for GNAT, whose opposition effort he said only served to divide residents as no other local issue has done in recent memory. He said only 200 residents came out to oppose the project at public meetings, in a county of 59,000 residents — a number in synch with the 200 protestors reported in local news accounts of the final DHS hearing in Butner,

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WD0408 Grady Thrasher, III [hgt@thrasher.com] From: Sent: Wednesday, August 20, 2008 1:10 PM To: NBAFProgramManager Emailing: 2008-08-20 Flagpole editorial Subject: Attachments: 2008-08-20.htm Dear NBAF Program Manager, 1|5.2 Please include the attached editorial published today in the Flagpole Magazine as a comment of record from Athens, GA regarding the NBAF DEIS. Thank you.

Comment No: 1 Issue Code: 5.2 DHS notes the information submitted by the commentor.

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WD0408



Keep Athens Weird

originally published August 20, 2008

There are so many arguments for and against locating the National Bio- and Agro- Defense Facility (NBAF) here in Athens that it appears something else besides specific issues determines people's attitudes toward NBAF. Two people, neither one knowing anything about science, decide that NBAF would and would not be hazardous to our health. Two scientists decide the same. Two business people decide that the benefits are worth the risk, or not. Anybody you talk to, who has made up her mind, stresses the benefits, or the dangers, of NBAF.

The NBAF facility would study deadly pathogens, but there are already labs right in the middle of campus doing the same thing, as do the Centers for Disease Control adjacent to the Emory campus in Atlanta. NBAF would impose a giant facility onto everybody's favorite greenspace out Milledge Avenue, next to the river and the botanical garden, but the university will eventually build out that land, NBAF or not.

If you add up all the negatives - the Department of Homeland Security as managers of the facility, the risk of exposing livestock and wildlife to hoof and mouth and other diseases, infected mosquitoes, the water use, the giant lit-up buildings, the impact on the botanical garden and the river and the bird flyways; the secrecy, the Bush Administration, the threat of terrorist attack, the phony science, the torture of animals, the disposal of infected carcasses into our air or our water - how could anybody want such a place in Athens?

If you add up all the positives - the jobs and economic impact of the construction and operation of the facility, including the scientific synergy with the university and bio-tech firms already here and sure to come - how could anybody not want such a perfect example of the kind of research node deemed perfect for Athens?

One clue to this conundrum is the opposition of artists. Our local community of artists is opposed to NBAF in Athens. The artists are not an organized group, but a lot of them know each other and they know when a wrong element messes up the picture. The artists, among many other citizens here, sense that this giant facility is out of scale with Athens and they are offended. That it is also dangerous and foisted upon us by a dictatorial administration just makes it worse and easier to oppose and talk about. But at bottom, if you think of Athens as a canvas - a landscape, a cityscape, an abstract, even - if Lamar Dodd were looking over your shoulder, jaw clamped on his pipe, he would point to that big, out-of-scale excrescence and growl, "What's this?"

If it were not NBAF but, say, a giant Mercedes-Benz factory, the artists would probably be up in arms over seeing our community dominated by one powerful corporate presence squatting in that green Eden out Milledge.

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WD0408

That's not to say that the university, government and business leaders who support NBAF don't have any art appreciation. They do, of course, but they don't let it interfere with business. For artists, of course, art is their business. Herein lies the disconnect. Both sides are right. We do need the jobs; we don't need a giant, potentially dangerous Homeland Security installation dominating our town. There's no way to compromise these two visions of Athens.

While our artists have always celebrated creativity and the life it gives to Athens, our government and business leaders have always sought for ways to sell Athens to industry. And of course we're all here because of the university, which makes the artists possible and sustains our community whether or not industry comes. To say that the artists are among those who are doing okay, thanks to the university, and don't need those factory jobs would be to miss the point. The artists understand the soul of Athens, the kairos, the right thing that, if lost, makes Athens anyplace, or worse. The artists are fighting NBAF as they would a prison facility or any other industry that would so dominate the landscape as to change the Classic City. We've been through all this before: years ago the Chamber tried to change the Classic City into Advancing Athens, and though they've pretty much dropped the term, that's still the aim.

Neither the artists nor the Chamber will decide this one. The federal bureaucracy will make this call, and we'll either get NBAF or not. If we don't, let's remember what the artists are telling us and come to some kind of community consensus about what kind of growth we need, how to grow yet preserve the soul of Athens, how to look together at the big picture.

Pete McCommons

editor@flagpole.com

2-2381 December 2008

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		-
		ı
	WD0501	
From: Grady Thrasher, III		
Sent: Friday, August 22, 2008 1:47 PM		
Sent. Friday, August 22, 2000 1.47 FW		
To: NBAFProgramManager		
Subject: NBAF DEIS Comment from Athens, GA		
Attachments: Spring.doc		
Dear NBAF Program Manager,		
Please include the attached on the record of NBAF DEIS comments from Athens,		
GA. Thank you.		
		_

2-2382

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1 27.0

WD0501

A Spring Walk

We walked along a meadow today and took our time along the way. The field was green with new grown hay, and bees and crickets were out to play. While by the creek near woodland shade, wild flowers bloomed in a tiny glade.

We stopped to take a moment's rest, smiled at a sparrow's puffed up chest, in brave defense of her fledglings' nest from uninvited human guests. We watched the flowers, one by one,

We watched the flowers, one by one, as each bloom opened to the sun.

We saw a butterfly poised and still atop a yellow daffodil sip a cool, sweet springtime toast from its honey-nectared host. And as we watched it flutter by, It seemed that we had wings to fly.

Grady Thrasher (from "Tim and Sally's Garden of Poems" copyright 2008)

2| 13.2

Note to NBAF Program Manager: This is an example of what DHS would destroy if NBAF were to be built on that unique, distinctive, environmentally sensitive and beloved acreage next to our State Botanical Garden. Please place this poem and comment on the NBAF DEIS record relating to Athens, Georgia.

Thank you,

Grady Thrasher August 22, 2008

Comment No: 2 Issue Code: 13.2

DHS acknowledges the commentor's submittal of a poem that characterizes the natural beauty of the State Botanical Garden and the surrounding area. DHS also notes the commentor's concern regarding the proximity of the South Milledge Avenue Site to the State Botanical Garden. As indicated in Sections 3.8.3.2 and 3.8.3.3 of the NBAF EIS, construction and normal operations of the NBAF would have no direct impact on the State Botanical Garden. The NBAF would affect primarily pasture areas that have low wildlife habitat value due to their disturbed condition, lack of native vegetation, and lack of wildlife food and cover. The forested portion of the NBAF site along the Oconee River is a high-value riparian wildlife corridor that connects the State Botanical Garden with Whitehall Forest. However, impacts to the forested riparian area would be minor (0.2 acre), and these impacts would occur within the existing pasture fence-line in areas that have been disturbed by grazing. Construction would occur primarily on disturbed pasture areas, and the high value forested riparian corridor would be retained. Therefore, the NBAF have minimal effects on wildlife and ecology of the State Botanical Garden.

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		WD0054
	From:	Grady Thrasher, III
	Sent:	Sunday, July 13, 2008 9:52 AM
	To:	NBAFProgramManager
	Subject: Attachmen	Emailing: OnlineAthens.com Opinion NBAF isn't best idea for development 07-13-08 ts: OnlineAthens.com Opinion NBAF isn't best idea for development 07-13-08.htm
27.0	Please add the a	attached Athens Banner-Herald article to the scoping comments of NBAF in Athens, GA.
	Be sure to inclu	de the email comments attached to the article. Thanks.

Comment No: 1 Issue Code: 25.2 DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

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WD0054

http://onlineathens.com/stories/071308/opinion 2008071300538.shtml



NBAF isn't best idea for development

Forum

By Matt DeGennaro | Commentary | Story updated at 4:59 PM on Sunday, July 13, 2008

The Department of Homeland Security has issued the 1,000-page Draft Environmental Impact Statement for the National Bio- and Agro-Defense Facility, for which Athens-Clarke County remains on the short list. If you read the headlines in local media - "Risk from biolab nil, feds claim," "Government study says NBAF safe" - you'd think everything was A-OK. If you read just the executive summary of the DEIS, you'll find a paragraph that says "potential adverse effects" range from "negligible" to "moderate," while "potential beneficial effects" are "significant."

But if you read the entire draft, you might be surprised to find some things you didn't know about NBAF, and question whether it's really such a great idea.

We heard the site selection process for NBAF was going to be transparent. The lab would fight poverty by providing Athenians lots of jobs. It's going to be safe. When the recent foot-and-mouth disease outbreak in England was discussed, we were told not to worry. That was from a vaccine manufacturing plant. To produce vaccines, one needs more than just the "teaspoon-sized" amounts that NBAF would study, we were told.

But, the DEIS tells a different story. NBAF will house a "laboratory for small-scale vaccine and reagent production ... with a BSL-3 Enhanced Viral Production Area ..." So it looks like NBAF will be manufacturing some vaccines, storing considerably more pathogen than "leaspoon-sized amounts." According to the DEIS, "the largest scale envisioned for manufacturing needs in this facility is 30L - 50L." That's liters vs. teaspoons.

Then there's the bugs, or rather the "vectors." In the DEIS we learn NBAF will have its own "insectary" to keep "infected live insects or arthropods for virus transmission studies to and from both infected and non-infected large animals and small animals." Insects like mosquitoes and ticks, subject to escape, which due to our warm climate - would be a big problem. According to the DEIS, "establishment of infected mosquitoes in one of the southeastern sites could lead to a more rapid dispersal of the disease to larger human populations such as in the Atlanta or San Antonio areas and ultimately lead to a permanent reservoir of virus."

The Department of Homeland Security has recognized we are in a severe drought, but this still hasn't eliminated Althens as a potential NBAF site. In fact, NBAF's original estimate of using 21 million to 32 million gallons of water per year has turned into a 43-million-gallon estimate.

And all those jobs NBAF supporters strongly implied would go to the poor? First, we heard NBAF would employ 500, then 250 to 350, with "many" jobs staffed locally. Finally, in the DEIS we read, "NBAF would directly employ 326 people. The majority of these employees would be research scientists and other

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WD0054

specialized staff, and based on census journey-to-work data, 257 would be expected to relocate to the study area from elsewhere in the country."

This would leave Athens with 69 permanent positions to fill. About the same as a couple of fast-food joints and a muffler shop.

A lot has happened since the DHS came to town in February. There was talk of a secret \$21 million incentive package offered by Georgia officials. We learned no details of a needed "central utilities node" at the NBAF site; University of Georgia Vice President for Research David Lee told us he was not obligated to release information that may put us at a competitive disadvantage.

And, just a few months ago, the Government Accountability Office, investigating whether it would be safe to move foot-and-mouth disease research from a federal facility on Plum Island, N.Y., found "DHS has not conducted or commissioned any study to determine whether FMD work can be done safely on the U.S. mainland." It also found that "given that releases can occur from any biocontainment facility, an island location can provide additional protection." DHS seems to reach the same conclusion. The DEIS says "with the exception of Plum Island, each of the proposed sites resides in an area where the wildlife, vegetation, agriculture, and human populations provide ample opportunity for each of the viruses to become established and spread rapidly once released from NBAF."

The GAO findings aren't anywhere in the DEIS. The NBAF site selection process has never been driven by safety first. The DHS threw a big shiny, disease-ridden ball in the air to see which town would jump highest to catch it. Neither DHS, UGA nor our local elected officials will ever take off their blinders and see the risks of this project; they will just continue to talk about the "perfect fit," the economic benefits, the

You can prevent NBAF from forever changing the face of Athens, and the time to do so is now. The DEIS says some of the original applicants were eliminated because of "weaknesses or deficiencies" including "insufficient community support." Send your comments to nbafprogrammanager@dhs.gov before Aug. 25. Go to one of the Aug. 14 meetings at the Georgia Center for Continuing Education and speak out. Politics, prestige and pandering should take a back seat to our community's safety and unique character. If we don't continue to shout "no" to NBAF, come December the DHS may say "yes" to Athens.

· Matt DeGennaro is a local freelance writer who lives near the South Milledge Avenue site proposed for

Published in the Athens Banner-Herald on 071308

COMMENTS

Just what Athens needs, to become a terrorist target!

Sunday, July 13, 2008

You better believe this will put Athens on the map...IN A BIG BAD WAY. NBAF will be the largest germ structure in the world and the terrorist will know it.

You can strike off tourism in Athens. You can strike off retirement in Athens. You can strike off large manufacturing companies in Athens. (They are not going to bring their employees to Germ Town.) And for UGA students, what parent in their right mind would send their precious child to live on The New Plum Island.

Hopefully Matt DeGennaro sent this letter to Atlanta Journal and other newspapers through out Georgia, because this bio-terror lab will affect our entire State for the worse.

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	W	/D0054
This will not make Athens any more of a "terrorist target" than it already is with 90,000 afternoon.	football fans on a Saturday	
Just got off the turnip truck?	Sunday, July 13, 2008	
Nope. Just know what I'd attack if I were a turrorist!	Sunday, July 13, 2008	
oops, a scientist made an errorglad it was just spelling.	Sunday, July 13, 2008	
Nope, was trying to do my W. impression via blog. Guess you don't have a sense of hi	Sunday, July 13, 2008 umor :-)	
Bad try.	Sunday, July 13, 2008	
Well get yourself a sense of humor, then.	Monday, July 14, 2008	
Try reading the article before commenting!	Sunday, July 13, 2008	
I did, thanks.	Sunday, July 13, 2008	
Then try comprehending the article before commenting!!	Sunday, July 13, 2008	
I did, thanks.	Sunday, July 13, 2008	
You left the same comment last week. Wake up and smell the roses, (oopsthe infects stadiums all across the country, but only one NBAF.	Sunday, July 13, 2008 and cow sh*t.) There are	
Actually, not me but I agree w/ whoever did.	Sünday, July 13, 2008	
Pres. Adams & Dr. Lee:	Sir Walter Scott Sunday, July 13, 2008	
Oh what a tangled web we weave, When first we practice to deceive.		
Excellent Forum! Thanks, Matt, for helping the community understand what a bad idea	Sunday, July 13, 2008 a NBAF is for Athens.	
	FACT FINDER Sunday, July 13, 2008	
"Insectary"		
Let me tell you about Rift Valley Fever.		
Quote from DEIS: "The warm climate and aquatic habitat suitable for anthropod vecto etc.) would increase the likelihood that the RVF (Rift Valley Fever) would establish a si		
CDC: Humans usually get RVF through bites from infected mosquitoes and possibly o virus-contaminated mouthparts. There is no established course of treatment for patien Studies have shown that sleeping outdoors at hight in geographical regions where out factor for exposure to mosquito and other insect vectors.	ts infected with RVF virus.	
UGA VET: Humans are highly susceptible to RVF virus infection and are readily infect aerosols. Humans develop a sufficient viremia to be a source of infection for mosquito disease into uninfected areas. In humans, the incubation period is 4 to 6 days.		

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	WD005
	11 100034
Communicability	
Virus titers in infected humans are high enough to infect mosquitoes and introduce Rift Valley fever into new areas. Virus can be found in the blood and tissues. Ittp://www.state.nj.us/agriculture/divisions/ah/diseases/riftvalley.html	
This alone should keep NBAF out of ATHENS.	
FACT FINDE Sorry, UGA VET link is: Sunday, July 13, 20 tttp://www.vet.uga.edu/VPP/gray_book02/fad/rvf.php	
samm Sundey, July 13, 200 he NBAF should not be allowed to come to athens!	
JGA and the USDA should also be moved because they research deadly human diseases.	
No More Chains, Pleas Surday, July 13, 200 When there is such a strong reaction to an invasive development within a community it is obvious that this levelopment is not wanted. Should the Bio plant be installed here it is true that the quality of life will decrease for all he obvious reasons stated.	
I heart Burritt Sunday, July 13, 20 Well," the King said. "What makes you think the sky is falling?"	
Ducky Lucky told me," said Goosey Loosey.	
Cocky Locky told me,* said Ducky Lucky.	
Henny Penny told me," said Cocky Locky.	
Chicken Little told me," said Henny Penny.	
It's true," said Chicken Little. "I was there. I saw the sky. I felt it hit my tail."	
Silly Chicken Little," said the King as he reached into Chicken Little's tail. "It was only an NBAF acorn. It was there a along and you never even noticed it."	II
They all had a good laugh.	
Chicken Little later died from a mysterious animal pathogen, and Matt DeGennaro felt vindicated.	
Sunday, July 13, 20 Cary, now your stupidity is showing.	18
No Head In Sar Surday, July 13, 20 to enice if none of these existed and studying them was unnecessary. On the other hand, in human health, life expectancy is much greater and so is quality of life because scientists studied and understood the organisms and hen came up with vaccines or treatments. The same thing can be said about the maladies NBAF will study. Yes, here is risk, but it can be managed successfully and the track record of safety, though not perfect, is an historical act. The U.S. and Georigia ought to embrace the challenge and master it. If not, the situation re the food supply and unman health will be much more risky and prone to devastating pandemics and associated food shortages.	16
Anr Sunday, July 13, 20	

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	WD0054
Scare tactics. And Iraq had nuclear weapons.	
You are correct about one thing. Yes, there is risk and that risk should not be taken in Athens, GA.	
No, the food supply & human health will NOT be much more risky, with pandemics & food shortages, if Georgia does not embrace the challenge. This work can be done on Plum Island, away from where people live and with prevailing winds flowing to the Atlantic Ocean.	
People are not going to believe your scare tactics, just to accommodate cheap housing and easy transportation for a couple hundred scientists.	
Historical fact regarding track record of safety is a bunch of bull. So many of the accidents are not reported until someone gets caught or a snitch tells. To me integrity is just as important as extended life.	
"And Iraq had nuclear weapons."	8
Er, actually it didn't.	
You didn't get the scarcatic remark. Sunday, July 13, 200	8
Actually, I did. The same kinds of tactics used by Bush and crew are being used by anti-NBAFers.	8
"You are correct about one thing. Yes, there is risk and that risk should not be taken in Athens, GA."	8
So, you want the benefits of the research but none of the "risks"? There are plenty of people who live by Plum Island, btw. Like this comment? <u>lyeal incl</u>	
Sunday, July 13, 200 People do NOT live on Plum Island. The island is over 800 acres and no one lives there. Don't try to mislead folks.]	8
Monday, July 14, 200 It's right next door to Long Island!	8
Butnes Sunday, July 13, 200 Note to the NBAF cheerleaders: With the incident record the CDC is building, it is time you back off the CDC comparison. Most people didn't fall for the "look how safe the CDC is" comparison the first time but with this latest in a string of incidents a case is being build for just how risky these labs are. Moreover, the comparison is moot, since the NBAF is the first of its kind there is no precedent for comparison. These incidents at the CDC prove there is just cause to be concerned about these facilities operations.	8

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WD0055 Grady Thrasher, III From: Sent: Sunday, July 13, 2008 9:31 AM NBAFProgramManager To: Subject: FW: Emailing: CDC SAFETY Germ lab outages continue ajc.com Attachments: CDC SAFETY Germ lab outages continue ajc.com.htm Dear NBAF Program Manager, 1|25.2 Please place this on the NBAF scoping record under "Athens, Georgia does not want NBAF". Thank you, **Grady Thrasher** -----Original Message----From: Grady Thrasher, III [mailto:hgt@thrasher.com] Sent: Sunday, July 13, 2008 9:27 AM Subject: Emailing: CDC SAFETY Germ lab outages continue ajc.com Heidi, Please note the attached article in today's AJC regarding another power outage at the CDC with backup generators rease note the data-enter attitle in today SAC regarding another power order at the CDC. Human error and technical failing. This occurred Friday. At the end of the article is a list of recent occurrences at the CDC. Human error and technical failings seem to occur with startling frequency. We at FAQ are sending this in to the NBAF Program Manager to put it on the scoping record. With NBAF, DHS is engaging in an entirely new, previously untried and unproven effort by to build the world's larget bio-containment area for the infection and disposal of hundreds of large animals and insect carriers. Several of the most deadly diseases to be studied can be transmitted by aerosol means and in at least one example can be spread to humans via mosquitos. An FMV release, according to DHS's own DEIS, could cause billions in economic loss and could spread to several states in a matter of days. It seems the risks of accident and miscalculation are even greater than what the CDC is actually experiencing. Again, the question is: How much risk should a community be subjected to for an illusory economic benefit? Who balances that equation? Best regards, Grady Thrasher and Kathy Prescott FAQinc. "For Athens Quality-of-life"

Comment No: 1 Issue Code: 25.2 DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

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WD0055

CDC SAFETY: Germ lab outages continue

By Alison Young The Atlanta Journal-Constitution Published on: 07/13/08

A laboratory building that contains a deadly strain of avian flu and other germs is among four that lost power for more than an hour Friday when a backup generator system failed again at the Centers for Disease Control and Prevention.

The outage affected air flow systems in labs that help contain such germs as the H5N1 flu virus, which some experts fear could cause a pandemic. But there were no exposures to infectious agents, and neither workers nor the public were at any risk, said CDC spokesman Tom Skinner.

The outage is the latest in a string of mechanical and construction incidents at labs on the agency's Clifton Road campus — many in new buildings that are part of a \$1 billion construction plan.

Last summer, an hourlong power outage at a different CDC lab tower, called Building 18, resulted in a congressional hearing. The Government Accountability Office, the investigative arm of Congress, is still examining safety at the CDC's high-containment laboratories amid concerns raised years ago by agency engineers that the CDC's backup power system was likely to fail.

"It's important for people to understand that even though we lose power to these facilities from time to time, worker safety and the public's safety is not in jeopardy because multiple, redundant systems are in place, separate from those that rely on power," Skinner said Saturday.

Around 5:40 p.m. Friday, a Georgia Power transformer failed, cutting off electricity to part of the CDC campus. CDC's backup generators initially came on, Skinner said. But then the system detected some sort of power anomaly and shut itself off, cutting off backup power to three buildings, he said.

The buildings affected were:

> Building 17, a newer infectious disease research lab building, where scientists work with rabies, HIV, influenza and tuberculosis, including extensively drug-resistant strains. The building has Biosafety Level 3 (BSL-3) labs, which need electricity to maintain negative airflow. This key safeguard helps contain germs by making sure air is always being drawn into the lab and through special HEPA filters before leaving the building. When power is lost, the lab has neutral air that neither flows in or out.

> Building 20, a newer office building that also houses the agency's fitness center.

> Building 1 and Building 3, antiquated attached office buildings from about 1959.

Information about whether any labs were in use at the time of the outage was not immediately available Saturday, Skinner said.

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WD0055

"This happened late in the day and there were not many employees still in the buildings," Skinner said. "Those in the buildings evacuated without incident."

The power was out for about 1 hour and 15 minutes, Skinner said, and was restored when Georgia Power fixed the transformer problem.

A bird caused the blown Georgia Power transformer, said power company spokesman Jeff Wilson.

CDC officials did not attempt to override and restart the agency's backup generators because they didn't know what the anomaly was that shut them down, Skinner said.

Skinner also said there was no power disruption at Building 18, the \$214 million Emerging Infectious Diseases Laboratory that suffered the hourlong outage last summer.

The Atlanta Journal-Constitution reported last summer that government construction engineers had warned since 2001 that CDC's planned design for its centralized backup power generation system would not keep crucial lab systems from failing in an outage.

"I've been saying this for over three years now, but having the generators in this configuration gives us no protection whatsoever from many types of failures," CDC mechanical engineer Johnnie West wrote in an August 2003 e-mail to agency officials, one of several reviewed by the AJC.

CDC officials have said that despite West's concerns, the consensus of experts was that a centralized generator farm was better than having individual units at buildings.

Skinner emphasized that the CDC has many other physical barriers to contain germs that don't require electricity.

"I think people need to know we're talking about an enormous campus with complex systems, and we're never going to be able to fully eliminate power outages," Skinner said. "That's impossible. The key for us is to minimize the duration of the outage."

To reach staff writer Alison Young, call 404-526-7372.

RECENT LAB INCIDENTS

MAY 18, 2007: Blasting of granite by a CDC construction contractor sent rock flying, shattering two exterior windows in Building 15, including one on a floor 150 feet away from a maximum-containment Biosafety Level 4 (BSL-4) lab that works with deadly germs such as Ebola. Rocks also damaged windows at Building 17, about 50 feet away from a high-containment Biosafety Level 3 (BSL-3) lab.

MAY 25, 2007: Nine workers were tested for possible exposure to Q fever, a bioterror agent, after a ventilation system in Building 18 malfunctioned and pulled potentially contaminated air into a "clean" corridor. Nobody was

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infected. Duct tape now seals the Q fever BSL-3 lab door in what the CDC says is an added precaution until a new door is installed.

JUNE 15, 2007: A lightning strike knocked out power for an hour at Building 18; backup generators did not come on. Nearby construction work had damaged a key component of the building's grounding system.

DEC. 8, 2007: During a planned evacuation drill of Building 18's labs that was designed to simulate a power outage, emergency lights initially came on but failed after 10 minutes when a technician inadvertently shut off a back-up power system, according to a CDC after-action report obtained by the AJC.

DEC. 18, 2007: Building 18 had a real evacuation after its new medical waste incinerator was started for a test and vented smoke into the high-containment lab area. Excessive heat caused the incinerator's bypass stack to tear away from its anchor bolts, internal records show.

FRIDAY: A bird caused a Georgia Power transformer to fail, knocking out power to part of the CDC campus for about 1 hour and 15 minutes. Then CDC's backup generators failed to keep power on at four buildings: the infectious disease lab Building 17, and offices in Buildings 1, 3 and 20.

SHANNON PEAVY / Staff POWER OUTAGES AT THE CDC A key lab building and three office buildings lost power for more than an hour Friday. Last summer a different lab building had an hour-long power outage. Map locates buildings affected by power outage Friday and building affected by outage on June 15, 2007. Map shows which buildings are infectious disease labs and which are office buildings. Inset map outlines area of detail in DeKalb County relative to metro Atlanta. Sources: CDC, AJC research

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WD0087 Grady Thrasher, III From: Sent: Saturday, July 19, 2008 12:03 PM NBAFProgramManager To: Subject: FW: Emailing: CDC SAFETY Germ lab outages continue ajc.com I Attachments: CDC SAFETY Germ lab outages continue ajc.com.htm 1 23.0 Dear NBAF Program Manager, Please include this in the "Athens and surrounding communities do not want NBAF" scoping file. 2 25.2 Thank you, FAQinc "For Athens Quality-of-life" www.athensfaq.org ----Original Message--From: Grady Thrasher, III Sent: Sunday, July 13, 2008 2:22 PM Subject: FW: Emailing: CDC SAFETY Germ lab outages continue ajc.com Dear Oconee County Commissioners, Please do not take the threat of NBAF lightly. Read the Government Accountability Report dated May 22, 2008 which states that DHS does not have evidence to conclude that FMD work can be done safely on the U. S. mainland. Read the 1000 page draft Environmental Impact Study recently released by DHS (not just the disingenuaous and misleading Executive Summary) which reveals many new issues, including but not limited to the possibility of incinerating hundreds of infected carcasses of large animals, breeding mosquitos and other insect vectors of diseases that could transmit to humans via those insects and discloses that Plum Island would be the safest location, In fact, Georgia, because of its warm climate, would be at greater risk in the event of a pathogen release. A presently incurable foreign disease (not presently in the U.S.) could more easily become permanently established in our environment and the human and wildlife population. We are looking to you to act responsibly to protect the citizens, livestock and wildlife of Oconee County. Please say no to NBAF. Best regards, Grady Thrasher and Kathy Prescott 2851 Flat Rock Road Watkinsville, GA 30677 Co-founders of FAQinc. "For Athens Quality-of-life" -----Original Message--From: Grady Thrasher, III Sent: Sunday, July 13, 2008 9:27 AM Subject: Emailing: CDC SAFETY Germ lab outages continue ajc.com Dear Friends and Neighbors, Please note the attached article in today's AJC regarding another power outage at the CDC with backup generators failing. This occurred Friday. At the end of the article is a list of recent occurrences at the CDC. Human error and technical failings seem to occur with startling frequency. We at FAQ are sending this in to the NBAF Program Manager to put it on the scoping record. With NBAF, DHS is engaging in an entirely new, previously untried and unproven effort to build the world's larget bio-containment area for the infection and disposal of hundreds of large animals and insect carriers. Several of the most deadly diseases to be studied can be transmitted by aerosol means and in at least of

Comment No: 1 Issue Code: 23.0

DHS notes the information submitted by the commentor.

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Comment No: 2 Issue Code: 25.2

DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

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WD0087	
example can be spread to humans via mosquitos. A Foot and Mouth virus release, according to DHS's own DEIS, could cause billions in economic loss and could spread to several states in a matter of days. It seems the risks of accident and miscalculation at NBAF are even greater than what the CDC is actually experiencing.	
Again, the question is: How much risk should a community be subjected to for an illusory economic benefit? Who balances that equation?	
Best regards,	
Grady Thrasher and Kathy Prescott	
FAQinc. "For Athens Quality-of-life"	
with the continue to the	

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WD0087

aic.com > nation/world

CDC SAFETY: Germ lab outages continue

By Alison Young The Atlanta Journal-Constitution Published on: 07/13/08

A laboratory building that contains a deadly strain of avian flu and other germs is among four that lost power for more than an hour Friday when a backup generator system failed again at the Centers for Disease Control and Prevention.

The outage affected air flow systems in labs that help contain such germs as the H5N1 flu virus, which some experts fear could cause a pandemic. But there were no exposures to infectious agents, and neither workers nor the public were at any risk, said CDC spokesman Tom Skinner.

The outage is the latest in a string of mechanical and construction incidents at labs on the agency's Clifton Road campus — many in new buildings that are part of a \$1 billion construction plan.

Last summer, an hourlong power outage at a different CDC lab tower, called Building 18, resulted in a congressional hearing. The Government Accountability Office, the investigative arm of Congress, is still examining safety at the CDC's high-containment laboratories amid concerns raised years ago by agency engineers that the CDC's backup power system was likely to fail.

"it's important for people to understand that even though we lose power to these facilities from time to time, worker safety and the public's safety is not in jeopardy because multiple, redundant systems are in place, separate from those that rely on power," Skinner said Saturday.

Around 5:40 p.m. Friday, a Georgia Power transformer failed, cutting off electricity to part of the CDC campus. CDC's backup generators initially came on, Skinner said. But then the system detected some sort of power anomaly and shut itself off, cutting off backup power to three buildings, he said.

The buildings affected were:

> Building 17, a newer infectious disease research lab building, where scientists work with rabies, HIV, influenza and tuberculosis, including extensively drug-resistant strains. The building has Biosafety Level 3 (BSL-3) labs, which need electricity to maintain negative airflow. This key safeguard helps contain germs by making sure air is always being drawn into the lab and through special HEPA filters before leaving the building. When power is lost, the lab has neutral air that neither flows in or out.

> Building 20, a newer office building that also houses the agency's fitness center.

> Building 1 and Building 3, antiquated attached office buildings from about 1959.

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WD0087

Information about whether any labs were in use at the time of the outage was not immediately available Saturday, Skinner said.

"This happened late in the day and there were not many employees still in the buildings," Skinner said.

"Those in the buildings evacuated without incident."

The power was out for about 1 hour and 15 minutes, Skinner said, and was restored when Georgia Power fixed the transformer problem.

A bird caused the blown Georgia Power transformer, said power company spokesman Jeff Wilson.

CDC officials did not attempt to override and restart the agency's backup generators because they didn't know what the anomaly was that shut them down, Skinner said.

Skinner also said there was no power disruption at Building 18, the \$214 million Emerging Infectious Diseases Laboratory that suffered the hourlong outage last summer.

The Atlanta Journal-Constitution reported last summer that government construction engineers had warned since 2001 that CDC's planned design for its centralized backup power generation system would not keep crucial lab systems from failing in an outage.

"I've been saying this for over three years now, but having the generators in this configuration gives us no protection whatsoever from many types of failures," CDC mechanical engineer Johnnie West wrote in an August 2003 e-mail to agency officials, one of several reviewed by the AJC.

CDC officials have said that despite West's concerns, the consensus of experts was that a centralized generator farm was better than having individual units at buildings.

Skinner emphasized that the CDC has many other physical barriers to contain germs that don't require electricity.

"I think people need to know we're talking about an enormous campus with complex systems, and we're never going to be able to fully eliminate power outages," Skinner said. "That's impossible. The key for us is to minimize the duration of the outage."

To reach staff writer Alison Young, call 404-526-7372.

RECENT LAB INCIDENTS

MAY 18, 2007: Blasting of granite by a CDC construction contractor sent rock flying, shattering two exterior windows in Building 15, including one on a floor 150 feet away from a maximum-containment Biosafety

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Level 4 (BSL-4) lab that works with deadly germs such as Ebola. Rocks also damaged windows at Building 17, about 50 feet away from a high-containment Biosafety Level 3 (BSL-3) lab.

MAY 25, 2007: Nine workers were tested for possible exposure to Q fever, a bioterror agent, after a ventilation system in Building 18 malfunctioned and pulled potentially contaminated air into a "clean" corridor. Nobody was infected. Duct tape now seals the Q fever BSL-3 lab door in what the CDC says is an added precaution until a new door is installed.

JUNE 15, 2007: A lightning strike knocked out power for an hour at Building 18; backup generators did not come on. Nearby construction work had damaged a key component of the building's grounding system.

DEC. 8, 2007: During a planned evacuation drill of Building 18's labs that was designed to simulate a power outage, emergency lights initially came on but failed after 10 minutes when a technician inadvertently shut off a back-up power system, according to a CDC after-action report obtained by the AJC.

DEC. 18, 2007: Building 18 had a real evacuation after its new medical waste incinerator was started for a test and vented smoke into the high-containment lab area. Excessive heat caused the incinerator's bypass stack to tear away from its anchor bolts, internal records show.

FRIDAY: A bird caused a Georgia Power transformer to fail, knocking out power to part of the CDC campus for about 1 hour and 15 minutes. Then CDC's backup generators failed to keep power on at four buildings: the infectious disease lab Building 17, and offices in Buildings 1, 3 and 20.

SHANNON PEAVY / Staff POWER OUTAGES AT THE CDC A key lab building and three office buildings lost power for more than an hour Friday. Last summer a different lab building had an hour-long power outage. Map locates buildings affected by power outage Friday and building affected by outage on June 15, 2007. Map shows which buildings are infectious disease labs and which are office buildings. Inset map outlines area of detail in DeKalb County relative to metro Atlanta. Sources: CDC, AJC research

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		WD0093				
	From: Sent:	Grady Thrasher, III Monday, July 21, 2008 5:52 PM				
	To:	NBAFProgramManager				
	Subject:	FW: Emailing: BSL.042908.AgCmte.ltr				
1 27.						
0						
	Γhank you,					
	Grady Thrasher for FAQinc "For Athens Quality-of-life"					
1	Original Message From: Grady Thrasher, III Sent: Tuesday, May 13, 2008 7:50 AM To: Mayor@Athensclarkecounty. Com Cc: Subject: Emailing: BSL.042908.AgCmte.ltr					
	Dear Heidi and Kathy,					
	Energy and Commoversight and Invand the proposed Influreday, May 22 underscore many to the ACC governorshooding. We hisk/benefit/cost at letter, DHS's approposition we've adv	In John Dingell, Chairman of the House Committee on nerce and Bart Stupak, Chairman of the Subcommittee on estigations, regarding raising serious issues regarding DHS NBAF. A hearing will be held starting at 10 am next 20 and can be watched via a webcast. Dingell and Stupak of the issues we at FAQinc. have been trying to communicate nment and the community. We believe the community is tope this will help with the ACC government's naulysis of NBAF in Athens. As you will see from the oach is viewed as having had the cart before the horse-a vocated from the first. The "competition" for NBAF has the beginning in this respect.				
		nd Kathy Prescott Athens Quality-of-life"				

Comment No: 1 Issue Code: 27.0 DHS notes the information submitted by the commentor.

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HENRY A WAMMA, CALIFORNIA
HENRY A WAMMA, CALIFORNIA
RICK BOLOHER, VIRGINA
EDOL/HILL STOME, NEW YORK
FRANK PALLOME, M., NEW JERSEY
BOOD, PHILONG, M., NEW JERSEY
BOOD, CALIFORNIA
BLOTH E. STOME, NEW YORK
ALBERT R. WYNH, MARYLAND
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U.S. House of Representatives

Committee on Energy and Commerce Washington, DC 20515-6115

JOHN D. DINGELL, MICHIGAN CHAIRMAN

April 29, 2008

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1 cont.| 27.0

The Honorable Collin C. Peterson

Chairman

Committee on Agriculture
U.S. House of Representative
Washington, D.C. 20515

The Honorable Bob Goodlatte

Ranking Member Committee on Agriculture

U.S. House of Representatives Washington, D.C. 20515

Dear Chairman Peterson and Ranking Member Goodlatte:

We understand that the House-Senate Joint Conference Committee on H.R. 2419 (the Farm bill) may be close to agreement on the major provisions of this important legislation. Among the unresolved issues, however, are provisions contained in Section 11016 of the Senate version of the bill and in Section 7108 of the House version that would provide for the transfer of live virus of foot-and-mouth disease from the animal disease research laboratory on Plum Island, N.Y., to the mainland United States. These proposals are highly controversial, yet neither has been the subject of hearings nor open debate. Decisions on these issues could have grave implications for the livestock industry and for the national economy. It is for this reason that we write to urge you to drop both the House and the Senate provisions until such time as these matters can be fully examined and debated.

By way of background, for more than 50 years the Federal Government has conducted animal disease research on Plum Island under the U.S. Department of Agriculture (USDA). In 2003, Plum Island was transferred from USDA to the Department of Homeland Security (DHS), while the research staff continued to be employed by USDA. The majority of the research at Plum Island is concentrated on foot-and-mouth disease, one of the most contagious animal viruses in the world.

The lab was originally sited on Plum Island to isolate foot-and-mouth disease from the mainland. Our investigation shows that this has been a very successful strategy, as foot-and-mouth disease has never escaped from the island, despite at least one instance in which it was accidentally released from the laboratory building.

¹Although an administration bill addressing similar issues, H.R. 1717, was considered in markup last year by the House Committee on Homeland Security, no committee report has ever been filed, and the single hearing held on the bill featured only Administration witnesses.

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LIFE STEAMS, FLORIDA,

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WD0093

The Honorable Collin C. Peterson The Honorable Bob Goodlatte Page 2

The isolation of foot-and-mouth disease on Plum Island was further ensured by a Federal statute enacted many years ago, which prohibits research on foot-and-mouth anywhere in the U.S. except on Plum Island, unless the Secretary of Agriculture finds it is both necessary and in the public interest to move it elsewhere (21 U.S.C. 113a).

DHS now wants to eliminate this protection and take over research on foot-and-mouth disease and other dangerous animal and zoonotic diseases. To accomplish this, Section 11016 of the Senate version of the bill directs the Secretary of Agriculture to do what no previous Secretary has ever done—issue a permit to DHS at its own discretion to transfer foot-and-mouth disease from Plum Island to the mainland United States.

DHS intends to transfer foot-and-mouth disease to a new lab it proposes to build on the mainland U.S., to be called the National Bio and Agro-Defense Facility (NBAF). The NBAF would be the world's largest animal disease research center, and include the world's largest Biosafety Level-4 laboratory (BSL-4). BSL-4 labs handle the most deadly diseases for which there is no cure.

1 cont.| 27.0

There is a serious question as to whether DHS has the expertise, understanding, and technical capability for conducting animal disease research, especially on this scale. The stakes are not small—as you are aware, foot-and-mouth disease is among the most highly contagious animal diseases in the world. The 2001 outbreak of foot-and-mouth disease in the United Kingdom caused at least \$16 billion in damage, devastated the economy, and nearly brought down the government. Experts in the U.S. estimate that a similar release in the U.S. would be even more destructive.

The Committee on Energy and Commerce and its Subcommittee on Oversight and Investigations are investigating these and related issues as part of a series of hearings on the proliferation of bio-research laboratories. The Subcommittee is holding a hearing on May 22, 2008, to examine these and related issues:

- Has DHS given adequate consideration to the hazards of shutting down Plum Island and transferring foot-and-mouth disease to the mainland?
- Can foot-and-mouth disease and other exotic animal disease research be carried out safely in bio containment facilities on the mainland?
- What are the views of the livestock industry about the plan to transfer foot-and-mouth disease research to the mainland?
- Have the direct and indirect costs of shutting down Plum Island and building the NBAF on the U.S. mainland been fully considered?

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The Honorable Collin C. Peterson The Honorable Bob Goodlatte Page 3

1 cont. | 27.0

- Is there an agricultural need for a BSL-4 lab at the NBAF?
- · Is the NBAF site-selection process being conducted fairly?
- Does DHS have adequate experience and expertise to lead Federal research on dangerous animal diseases, or should that responsibility more properly reside with USDA?

We believe these issues should be thoroughly examined before the proposal to transfer foot-and-mouth disease to the mainland is permitted. As part of our investigation, we have sent detailed requests for information and records pertaining to this matter to DHS and USDA. Moreover, we have sent letters to more than 100 livestock associations asking for their views on the issue of transferring foot-and-mouth disease research to the mainland, along with research on other animal diseases.

We recommend that you reject provisions in H.R. 2419 that would require the transfer of foot-and-mouth disease to the mainland until such time that DHS and USDA, at a minimum, have performed the necessary risk and consequence assessments, explained why it is necessary and in the public interest to move foot-and-mouth disease and other dangerous animal viruses to the mainland, and performed the necessary environmental impact studies.

Sincerely,

John D. Dinge Chairman

Chairman

bubcommittee on Oversight and Investigations

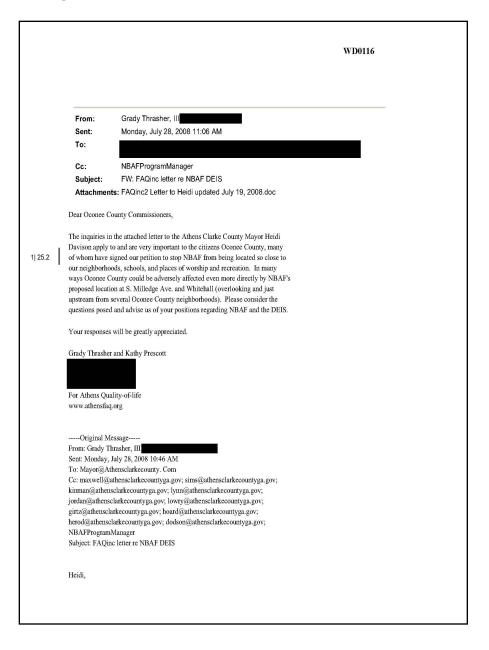
cc: The Honorable Joe Barton, Ranking Member Committee on Energy and Commerce

The Honorable John Shimkus, Ranking Member Subcommittee on Oversight and Investigations

All House conferees to H.R. 2419

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Comment No: 1 Issue Code: 25.2 DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

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Since the scoping meetings are only about two weeks away, the answers to the questions raised in our letter to you dated July 11 are becoming more and more critical. Since we haven't heard from you and now find you will be out of the office for a week, we believe it is necessary to include the other ACC Commissioners as well as the Oconee County Commissioners in our inquiry.

We trust the ACC government will act in the best interests of community awareness and make public what position each of the Commissioners will take regarding NBAF and the issues raised by the DEIS prior to August 14.

Best regards,

Kathy Prescott and Grady Thrasher For Athens Quality-of-life www.athensfaq.org

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WD0116

FAQinc. "For Athens Quality-of-life" 196 Alps Road, Suite 2, Box 205 Athens, Georgia 30606 www.athensfaq.org

July 11, 2008 (updated July 28, 2008)

Mayor Heidi Davison 235 Wells Drive Athens, Georgia 30606

Dear Heidi,

We trust you are doing well and that among the many important issues you deal with every day as our Mayor, you are staying tuned to the continuing NBAF saga.

As you know, the Department of Homeland Security recently released its draft Environmental Impact Statement for comment during the 60 day "on the record Scoping Period" which ends August 25, 2008. We needn't remind you that DHS will be in Athens on August 14, 2008 for two public meetings to receive citizen (and institutional) questions, concerns and commentary on risks and environmental degradation associated with the proposed NBAF being built and operated next to our State Botanical Garden.

FAQinc. "For Athens Quality-of-life" is engaged (through its citizensupporters as well as hired professionals) in deciphering and interpreting the massive, often dense and sometimes contradictory DEIS with a goal of explaining to our community how, if at all, the DEIS answers those many questions of concern to Athenians and residents of surrounding communities.

Given that the DEIS contains a thousand or so pages of information, it is easy to be seduced by its Executive Summary and over-simplified charts such as the "Comparison of Environmental Effects" (Table ES3). That summary and those charts tend to mislead rather than inform because they gloss over and in many cases *contradict*, important details contained in the body and appendices of the DEIS. *In assessing community health and safety the summary statements provided are completely inconsistent with*

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the facts and conclusions admitted to in the broader text. We raised this important issue at the DHS Scoping Meeting in Washington, DC on July 24. After the meeting, representatives of Dial Cordy made a special effort to acknowledge their concerns with the Executive Summary and summary charts in the EIS and to assure us that the misrepresentations would be corrected in the final EIS. But the real concerns raised in the body and appendices of the DEIS need to be examined carefully and candidly now, before the Athens Scoping Meetings scheduled for August 14.

In any event, we at FAQ intend to do our part to help inform and advise the citizenry of Athens/ Clarke, Oconee and adjacent counties regarding the DEIS and the need for citizen input. But we still look to the ACC government as the ultimate protector of our community's public health, safety and welfare. In this regard we at FAQ have several questions we hope you will help us answer regarding the NBAF site selection process. They are:

- (1) Since we all now have an abundance of new information with which to evaluate NBAF (whether revealed by Congressional inquiry, the Associated Press, contained in the DEIS or now revealed in the NBAF Feasibility Study just obtained through the Freedom of Information Act), what role will the ACC government play in interpreting, vetting and verifying all this new information so that appropriate questions and comments can be raised and made to DHS during the NEPA mandated Scoping Period and at the Athens scoping meetings scheduled for August 14? Will you attend the meetings and give comments? If so, will you be acting in your official capacity as Mayor or as an individual? If in your official capacity, will you seek official action by the ACC Commissioners before making representations regarding the position of the ACC government? Will you make it clear to DHS in which capacity you will be speaking?
- (2) If the ACC government chooses not to take a proactive role in the NBAF site selection process, on whose advice or recommendation will you and the ACC Commissioners rely with regard to the information presented in the DEIS that involves providing infrastructure and related services (such as water, sewer and traffic abatement), all of which may require effort and expenditure by the ACC government?
- (3) On issues regarding public health and safety as presented in the DEIS (deemed "moderate" in the full text, but shown as "insignificant" in the

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disingenuous Executive Summary, on whose advice or recommendation will you and the ACC Commissioners rely in determining whether to support, oppose or question the information, conclusions or deferred decisions discussed (or, in some cases, avoided) in the DEIS?

Some information contained in the DEIS not previously in the public sphere of knowledge about NBAF includes (this list is by no means all-inclusive):

- (1) DHS concedes the safest location for NBAF (among the six sites in contention) would be Plum Island. This determination alone should end the competition—but it hasn't.
- (2) DHS leaves open the question of whether NBAF will use incineration as its primary pathological waste (infected carcasses) disposal method. This raises and leaves unanswered air quality questions in the face of previous assurances from UGA and DHS that NBAF would be a "green" non-polluting industry. The DEIS discloses that NBAF, if incineration is used for carcass disposal, would be a "major Title V emission source" requiring permitting from local and state authorities.
- (3) The average projected daily water usage at NBAF has doubled to over 117,000 gallons per day in contrast to the DHS representatives' assurances during the DHS "town meeting" held in May of less than half that amount. The usage could go as high as 275,000 gpd during our hot, dry summer months, coinciding with the times our water sources are most vulnerable to drought.
- (4) Contrary to misinformation given by Dr. Larry Barrett (representing DHS at the Athens town meeting), *all* of the zoonotic diseases to be studied at NBAF *are* transmitted by aerosol or airborne means, and there have been instances where Nipah virus has spread from human to human.
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- (6) Contrary to DHS misinformation provided at the town meeting, NBAF will study the effects of pathogens on large herds of large animals—not small groups of small animals, thereby creating an

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WD0116

unprecedented bio-hazardous waste disposal challenge for Athens, the effective handling of which is still undetermined.

- (7) As revealed by the Government Accountability Office in May and admitted by DHS in the DEIS, accidents in bio-containment labs do happen—frequently. Most, if not all, result from human error or malfeasance. According to the GAO, technology cannot save us from our own failings. An accident involving Foot and Mouth virus could have a staggering economic downside measured in billions of dollars. The virus, which is possibly the world's most contagious, is carried on workers' breaths, in their throats, nasal passages and under their fingernails, among other areas. Deer and other wildlife are susceptible, not just cows, pigs and horses. The custodial workers will have daily contact with infected animals spewing virus from all of their orifices. It would seem only a matter of time before the virus, by accident or design, found its way into our receptive environment.
- (8) The DEIS admits to environmental degradation during NBAF construction, a period of time estimated to last at least four years, but likely much longer if UGA's Animal Health and Research Center, which took more than 12 years to build at three times its initial budget to and is just now achieving full certification, is any example.
- (9) The DEIS acknowledges noise, visual and light pollution affecting visitors to the State Botanical Garden, but dismisses NBAF's effect on the Important Bird Area joining the Botanical Garden with Whitehall Forest because the proposed NBAF site in the middle of the IBA is "mostly pasture".
- $\left(10\right)$ The DEIS acknowledges NBAF will aggravate traffic congestion on South Milledge and Whitehall.
- (11) The DEIS does not adequately take into account NBAF's dramatic effect on nearby neighborhoods in Clarke and Oconee County, although it admits to a 6.5 mile radius "infection zone" if there is a pathogen release. This zone includes about 50,000 people—90,000 more on Game Day.

It is clear that an NBAF at the offered location in Athens would bring real public health and economic risks plus environmental degradation, as now

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revealed by the DEIS and the GAO. Further, the DEIS leaves open questions of local government responsibility and cost yet to be answered or even fully examined. But the bottom line is the certainty that NBAF in Athens would in many ways adversely compromise the quality of life in our community. The DEIS admits that a pathogen outbreak or release would have a devastating effect on the public health, safety and economy of our entire region. This is not a risk our civic leaders need to casually assume for our community.

FAQ represents thousands of Athenians who are opposed to NBAF. Almost 2000 brave citizens have signed our "No NBAF" petition and many more have voiced their support of and appreciation for FAQ's opposition to NBAF. Whether you agree with FAQ or not, we believe all Athenians deserve a fair, critical and impartial inquiry by our elected representatives into the issues raised or avoided by the DEIS. The ACC government should rely on advice from disinterested parties, not ones affiliated with the University of Georgia, the lead proponent of NBAF in Athens. The UGA administration has demonstrated disingenuousness from the beginning in its advocacy of NBAF and has in many cases used its economic influence over employees and affiliates to dampen local opposition. In the interest of the entire community the results of your independent inquiry should be made public prior to the Scoping meetings on August 14.

We thank you for your attention to this critical situation, and we look forward to hearing from you at your earliest opportunity.

Best regards,

Kathy Prescott and Grady Thrasher for FAQ "For Athens Quality-of-life"

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WD0117

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2-2410 December 2008

Page 2 of 6

WD0117 Grady Thrasher, III From: Sent: Monday, July 28, 2008 10:46 AM Mayor@Athensclarkecounty. Com To: Cc: maxwell@athensclarkecountyga.gov; sims@athensclarkecountyga.gov; kinman@athensclarkecountyga.gov; lynn@athensclarkecountyga.gov; jordan@athensclarkecountyga.gov; lowry@athensclarkecountyga.gov; girtz@athensclarkecountyga.gov; hoard@athensclarkecountyga.gov; herod@athensclarkecountyga.gov; dodson@athensclarkecountyga.gov; NBAFProgramManager FAQinc letter re NBAF DEIS Attachments: FAQinc2 Letter to Heidi updated July 19, 2008.doc Since the scoping meetings are only about two weeks away, the answers to the questions raised in our letter to you dated July 11 are becoming more and more critical. Since we haven't heard from you and now find you will be out of the office for a week, we believe it is necessary to include the other ACC Commissioners as well as the Oconee County Commissioners in our inquiry. We trust the ACC government will act in the best interests of community 1| 25.2 awareness and make public what position each of the Commissioners will take regarding NBAF and the issues raised by the DEIS prior to August 14. Best regards, Kathy Prescott and Grady Thrasher For Athens Quality-of-life www.athensfaq.org

Comment No: 1 Issue Code: 25.2 DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

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WD0117

FAQinc. "For Athens Quality-of-life" 196 Alps Road, Suite 2, Box 205 Athens, Georgia 30606 www.athensfaq.org

July 11, 2008 (updated July 28, 2008)

Mayor Heidi Davison 235 Wells Drive Athens, Georgia 30606

Dear Heidi,

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2-2412 December 2008

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WD0117

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WD0117

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WD0117

revealed by the DEIS and the GAO. Further, the DEIS leaves open questions of local government responsibility and cost yet to be answered or even fully examined. But the bottom line is the certainty that NBAF in Athens would in many ways adversely compromise the quality of life in our community. The DEIS admits that a pathogen outbreak or release would have a devastating effect on the public health, safety and economy of our entire region. This is not a risk our civic leaders need to casually assume for our community.

FAQ represents thousands of Athenians who are opposed to NBAF. Almost 2000 brave citizens have signed our "No NBAF" petition and many more have voiced their support of and appreciation for FAQ's opposition to NBAF. Whether you agree with FAQ or not, we believe all Athenians deserve a fair, critical and impartial inquiry by our elected representatives into the issues raised or avoided by the DEIS. The ACC government should rely on advice from disinterested parties, not ones affiliated with the University of Georgia, the lead proponent of NBAF in Athens. The UGA administration has demonstrated disingenuousness from the beginning in its advocacy of NBAF and has in many cases used its economic influence over employees and affiliates to dampen local opposition. In the interest of the entire community the results of your independent inquiry should be made public prior to the Scoping meetings on August 14.

We thank you for your attention to this critical situation, and we look forward to hearing from you at your earliest opportunity.

Best regards,

Kathy Prescott and Grady Thrasher for FAQ "For Athens Quality-of-life"

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	WD0146
From:	Grady Thrasher, III
Sent:	Friday, August 08, 2008 7:59 AM
To:	NBAFProgramManager
Subject:	Emailing: OnlineAthens.com Letters to the Editor Matt DeGennaro Where is the due diligence on NBAF in Athens-Clarke 08-08-08
Attachmer	tts: OnlineAthens.com Letters to the Editor Matt DeGennaro Where is the due diligence on NBAF in Athens-Clarke 08-08-08.htm
Dear NBAF Pi	ogram Manager,
1 25.2 Please add the Banner-Herald	attached excellent letter published today in the Athens to the DEIS Scoping Record for Athens, GA.
Thank you.	
Timin you.	

Comment No: 1 Issue Code: 25.2 DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

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WD0146

Matt DeGennaro: Where is the due diligence on NBAF in Athens-Clarke?

| Story updated at 6:13 PM on Thursday, August 7, 2008

I also attended the recent Department of Homeland Security meeting in Butner, N.C., on the proposed National Bio- and Agro-Defense Facility. I watched as everyone from a 10-year-old kid to an elderly woman leaning on a cane - with doctors, nurses, mothers and scientists in between - told DHS they weren't welcome in Butner.

I listened to one young man tell the DHS the people of Butner didn't need to lie down in front of bulldozers to stop this project. They were farmers. They knew how to take buildozers apart. "Whatever It Takes" was their motto, and it was hard not to believe they weren't serious.

One young woman read the names of more than 20 local organizations opposed to NBAF. Well-informed local elected officials also spoke. Some said NBAF seemed like a great idea at first, but after further consideration, maybe wasn't such a good deal after all. Opposition based on evaporated benefits and unanswered questions seem to be the trend in North Carolina.

Last year, the nearby city of Raleigh hired an engineering firm to help officials come up with a list of questions and comments to submit to DHS regarding NBAF. Based on the information - or lack thereof - they received in response, city government staff now are recommending that the city council oppose NBAF. Even a North Carolina state senator has withdrawn his support.

Did Althens-Clarke or Oconee counties hire a similar firm to submit questions to the DHS? Besides the optimistic predictions of the state consortium and the DHS, what information have our local officials relied upon in their support for NBAF? How many of our representatives have even read beyond the misleading executive summary in the Draft Environmental Impact Statement, or sought out any independent viewpoint whatsoever?

When deciding on whether to support something as massive and as potentially deadly as NBAF, it is the duty of our local officials to look beyond the promises of a few vested interests and decide just who they represent in the first place.

The silence in Athens is deafening.

Matt DeGennaro - Watkinsville

Published in the Athens Banner-Herald on 080808

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MD0093

FAQ inc "For Athens Quality-of-life" 196 Alps Road, Suite 2, Box 305 Athens, Georgia 30606 www.athensfaq.org

August 18, 2008

James V. Johnson, NBAF Program Director Science and Technology Directorate U.S. Department of Homeland Security Mail Stop #2100, Murray Lane, SW Building 410 Washington, DC 20528

Dear Mr. Johnson:

We now have over 1500 signatures on our petition against NBAF, and we receive more every day, either online or in the mail. Considering UGA's direct and indirect economic pressure on all Athens businesses and most residents, we are proud so many have shown the courage to fight real and perceived intimidation to sign up and publicly oppose NBAF in our community. We will advise you of the total before August 25.

Kind regards,

Grady Thracker

4| 27.0 Enclosures

Comment No: 1 Issue Code: 13.2

DHS notes the commentor's concern regarding the proximity of the South Milledge Avenue Site to the State Botanical Garden/Whitehall Forest Important Bird Area (IBA). As indicated in Sections 3.8.3.2 and 3.8.3.3 of the NBAF EIS, construction and normal operations of the NBAF would have no direct impact on the IBA. The NBAF would affect primarily pasture areas that have low wildlife habitat value due to their disturbed condition, lack of native vegetation, and lack of wildlife food and cover. Although not part of the IBA, the forested portion of the NBAF site along the Middle Oconee River is a high-value riparian wildlife corridor that connects the State Botanical Garden with Whitehall Forest. However, impacts to the forested riparian area would be minor (0.2 acre), and these impacts would occur within the existing pasture fence-line in areas that have been disturbed by grazing. Construction would occur primarily on disturbed pasture areas, and the high value forested riparian corridor would be retained. As described in Section 3.8.3.3.4 of the Final EIS, noise and light impacts on adjacent habitats would be minimal. The NBAF would not be likely to have significant adverse effects on the IBA.

Comment No: 2 Issue Code: 12.2

DHS notes the commentor's concerns regarding possible impact to the area's water resources. The NBAF will be operated in accordance with the applicable protocols and regulations pertaining to stormwater management, erosion control, spill prevention, and waste management. Sections 3.3.3 and 3.7.3 of the NBAF EIS describe the potential water resources' consequences from NBAF's construction and operation and standard methods used to prevent and mitigate potential spills and runoff affects. Section 3.3.3.4 describes the local influent limits for the Middle Oconee WWTP. NBAF would have to meet or exceed sewage acceptance criteria and pretreatment requirements before discharging to the Middle Oconee WWTP. Section 3.13.4 describes the waste management processes that would be used to control and dispose of NBAF's liquid and solid waste. With respect to the rate of water use at the NBAF, it is noted that the anticipated rate of 118,000 gallons per day is approximately 0.76% of Athens' annual average of 15.5 million gallons per day. The South Milledge Avenue Site alternative would have access to 3 surface water resources: the North Oconee River, the Middle Oconee River, and the Jackson County Bear Creek Reservoir. The access to 3 surface water resources will help ensure the availability of water in the event that any one of those sources becomes in adequate.

Comment No: 3 Issue Code: 25.2

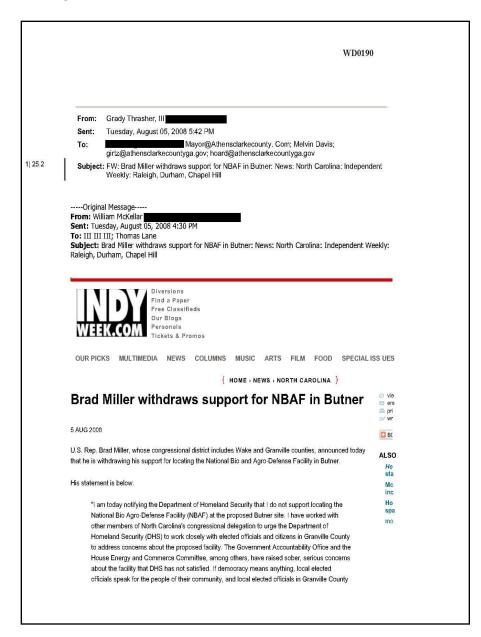
DHS notes the information submitted by the commentor.

Comment No: 4 Issue Code: 27.0

DHS notes the information submitted by the commentor.

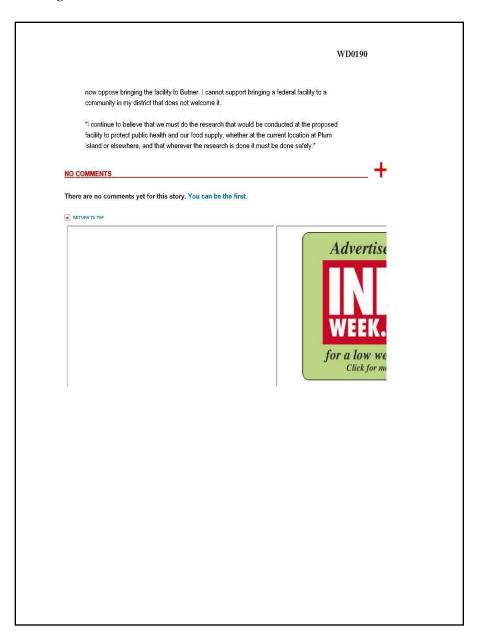
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Comment No: 1 Issue Code: 25.2 DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

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2-2420

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			WD0220	
	From:	Grady Thrasher, III		
	Sent:	Sunday, August 10, 2008 8:58 AM		
	To:	Jim Thompson		
	Subject:	Open Letter to Mayor Heidi Davison		
	Attachmer	nts: heraldsun.com Chamber leader withdraws support of lab.	htm	
1	Pete and Jim,			
ı	This is a letter	sent today to Mayor Heidi Davison from FAQinc. "For Athens		
		" in response to her comments published in today's ABH. It		
		be an "open letter". Please feel free to publish it if you worthy. FAQ believes it is.		
	icei ii is iiewsv	voility. PAQ believes it is.		
	Thank you,			
	Kathy and Gra	dy		
	Original M	lessage		
	From: Grady T	c c		
	Sent: Saturday, August 09, 2008 10:19 PM			
		hensclarkecounty.com,davison@athensclarkecountyga.gov Letter to Mayor Heidi Davison		
	Subject. Open	Letter to Mayor Field Davison		
	Mayor Davisor	n,		
	The tide has tu	rned against the special interests and in favor of the people		
		area. The truly informed people of Athens and Oconee County		
		te nightmare NBAF would be on S. Milledge, next to the ten—a nightmare that you, as our Mayor, invited DHS to impose		
		nity. Your action was apparently based on now discredited		
		om DHS and UGA, and was taken without citizen input. At the		
		very little substantive understanding by you or anyone in the		
		ent of the full scope of the problems, risks and costs NBAF if you acted in good faith at the time, your letter to DHS		
		and ready to accept this facility" can now only be seen, based		
		amination, as ill-considered and irresponsible. We ask you as		
		ghbor and fellow Athenian, to reexamine your earlier actions		
		AF in light of the facts revealed by the Government Office and the DEIS, itself. Saying "No" to NBAF would		
		than exploit, Athens'unique quality of life and would be in		
		h the wishes of an overwhelming majority of the people of the		
	community.			

Comment No: 1 Issue Code: 27.0 DHS notes the information submitted by the commentors.

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	WD0220			
We look forward to seeing you at the scoping meetings on Thursday. We hope you've had a chance to read the full DEIS. Please don't be lulled into complacency by the misleading Executive Summary or swayed by the twisted				
compacency by the misseaning executive summary or swayed by the instead rationale of the proponents of NBAF into continuing to foster their reckless agenda.				
Best regards,				
Kathy Prescott and Grady Thrasher for FAQinc."For Athens Quality-of-life"				
Original Message From: Grady Thrasher, III				
Sent: Saturday, August 09, 2008 9:40 PM To: Mayor@Athensclarkecounty. Com;davison@athensclarkecountyga.gov Cc: Chuck Horton; Don Norris; Margaret Hale; Melvin Davis; Jim Luke				
Subject: Emailing: heraldsun.com Chamber leader withdraws support of lab				
The President of the Butner Chamber of Commerce withdraws his support for NBAF, admitting he didn't have enough information when he recommended NBAF as a "no brainer" last year.				
See article attached below.				
		I		

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WD0220

Chamber leader withdraws support of lab By William F. West: The [Henderson] Daily Dispatch The Herald-Sun Aug 9, 2008

BUTNER – Further evidence of eroding local public support for having a proposed germ-fighting lab at Butner is now apparent in the changed stance of Granville County Chamber of Commerce President Johnny Balmer.

Balmer, at the time the Oxford-based civic organization's president-elect, had cited the potential influx of jobs and money in having the National Bio and Agro-Defense Facility. "It's a no-brainer. It's good for Granville County," Balmer said last October.

"A lot of times, when people have a not-in-my-backyard mentality, they don't think through the process of the economic benefit to the county," Balmer said

Now, the chamber president is saying he is neutral.

On Thursday night, Balmer sat in the audience and watched as the Butner Town Council unanimously voted not to endorse having the NBAF in southern Granville County.

Councilman Edgar Smoak, who led the vote, cited an extensive list of environmental and safety concerns he said were not addressed in a recent draft document by the federal Department of Homeland Security.

Butner's governing body as a whole previously had been maintaining a neutral stance.

At the end of the meeting, Balmer was asked about his position on the NBAF, particularly given his comments last fall.

Balmer asserted that his comment several months ago was before DHS was supposed to furnish much of the information discussed Thursday by the Butner Town Council.

"Since then, I have taken a 'Stop-and-look-see approach'," Balmer said.

When asked whether that means he is not taking sides, he replied in the affirmative.

Balmer then stated he was responding as an individual -- not as the chamber president

Meanwhile, the North Carolina Consortium for the National Bio- and Agro- Defense Facility said it is continuing to evaluate its position following renewed expressions of concern relative to the draft document.

The NCC-BBAF said in a release Friday that it believes strongly that the NBAF program would help protect the U.S. livestock industry, enhance public health and bring significant economic benefit to the Granville County region. However, the consortium remains concerned by claims from citizens and elected officials that DHS has not adequately addressed their concerns.

Responding to follow-up e-mail questions Friday, Balmer said the chamber's position is neutral, with the word neutral underlined and in capital letters.

Balmer on Thursday right said that a chamber board meeting, set for Tuesday morning in Oxford, would include the NBAF matter as a subject of discussion.

Balmer, in his e-mail Friday, said the upcoming meeting will not include the NBAF, but will be a normal session

"The statement that I made concerning talking about the NBAF in the meeting was merely a check of members to see if the board's position had changed," Balmer said.

In addition to Butner, NBAF sites being considered are at Athens, Ga.; San Antonio, Texas., Manhattan, Kan., and a town near Jackson, Miss

Another alternative would be building a new research lab on Plum Island, N.Y., while a seventh option includes not building the NBAF at all. The NBAF if approved for construction, would replace an aging lab at Plum Island, which is located at the tip of Long Island.

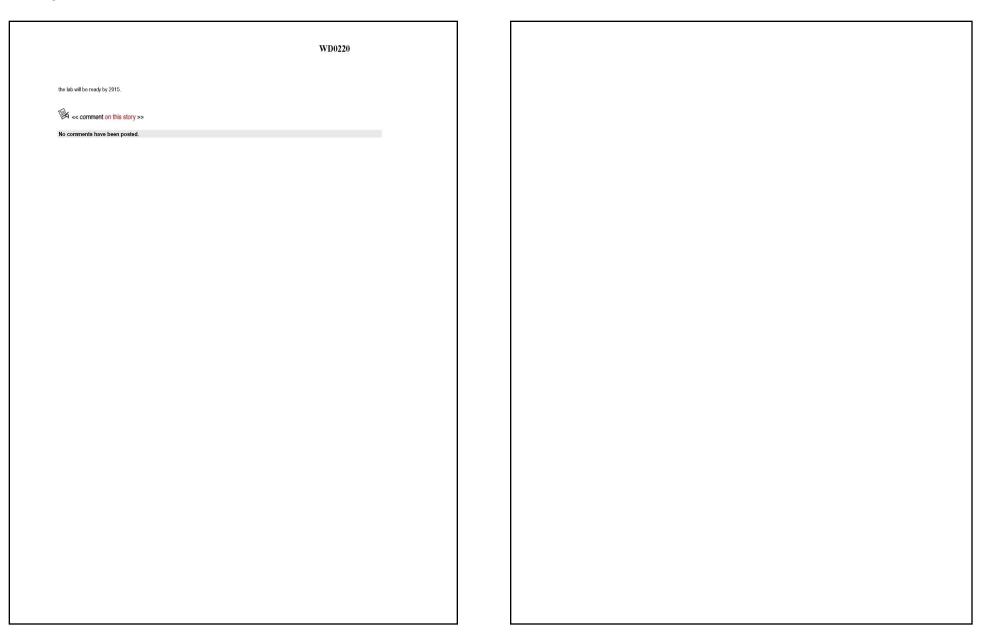
DHS has maintained the draft document showed there would be no adverse impact on the sites nationwide under consideration, including Butner.

Opposition leaders in Granville County have scoffed at the claim, arguing that the document does not address several pertinent questions, such as how those in mental hospitals and prisons in Butner would be evacuated in an emergency situation.

DHS said a final document should be ready by this fall, with a final decision to be made before the end of the year. DHS said if the NBAF is built, then

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WD0571

From: Grady Thrasher, III

Sent: Sunday, August 24, 2008 4:23 PM

To: NBAFProgramManager

Subject: FAQ inc

lawyers on Monday, August 25.

Attachments: FAQ inc letter to Jamie Johnson of DHS final.doc

Dear Mr. Johnson,

Please include the attached letter as part of the comment record on the NBAF

DEIS from Athens, GA. Although the letter was written in February, little
has changed relative to the opposition to NBAF and the inappropriateness of

NBAF on the proposed S. Milledge Ave. site in Athens. The DEIS has been
universally panned (except by NBAF proponents who want to gloss over health
and environmental risks and ecological destruction) as a woefully
inadequate, legally deficient document, presented in a way to apparently
mislead the public, the press and even decision makers. You will receive
more and definitive comments regarding the inadequacies of the DEIS from our

Thus, I thank you for putting the attached letter on the record to underscore that nothing much has occurred to quiet or diminish the opposition to NBAF in Athens in the past six months. If anything, the opposition has grown and become more concerned as information from the GAO, the national press and even the DEIS has begun to counter the propaganda offered by UGA.

NBAF is not appropriate for the S. Milledge site adjacent to our Botanical Garden, next to the Equestrian Center, overlooking our already stressed river, across from Whitehall Forest, in the middle of an Important Bird Area. As has been said before, the whole landscape around and including the proposed S. Milledge Ave. site is unique, distinctive, irreplaceable, and beloved as one of the most beautiful and special outdoor recreation areas and vistas remaining in Athens/Clarke County. To impose something as out of scale, invasive and ecologically destructive as NBAF on that site would be tantamount to placing the proverbial turd in our community's punchbowl, spoiling the natural beauty and enjoyment of the area for everyone--forever. And it would be DHS callously dropping that turd. Forgive my crude analogy, but I hope it gets your steering committee's attention. NBAF is not right for that site. And that site is not right for NBAF. Please place this commentary on the NBAF DEIS record also.

Thank you and best regards,

Grady Thrasher

3| 16.2

1 cont.| 25.2

for FAQinc. "For Athens Quality-of-life".

Comment No: 1 Issue Code: 25.2

DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

Comment No: 2 Issue Code: 4.2

DHS prepared the NBAF EIS in accordance with the provisions of NEPA (42 U.S.C. 4321 et seq.) and CEQ's regulations for implementing NEPA (40 CFR 1500 et seq.). The primary objective of the EIS is to evaluate the environmental impacts of the no action and site alternatives for locating, constructing and operating the NBAF. As summarized in Section 3.1 of the NBAF EIS, DHS analyzed each environmental resource area in a consistent manner across all the alternatives to allow for a fair comparison among the alternatives. The decision on whether to build the NBAF will be made based on the following factors: 1) analyses from the EIS and support documents; 2) the four evaluation criteria discussed in section 2.3.1; 3) applicable federal, state, and local laws and regulatory requirements; 4) consultation requirements among the federal, state, and local agencies, as well as federally recognized American Indian Nations; 5) policy considerations; and 6) public comment.

Comment No: 3 Issue Code: 16.2

DHS notes the commentor's concern. The potential effects of the population growth associated with the NBAF on the existing recreational facilities was assessed in Section 3.10.3. The recreational resources within the South Milledge Avenue Study Area would not experience a significant increase in utilization rates as a result of the population increase associated with the NBAF. The study area has abundant recreational resources available.

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WD0571

FAQ inc. "For Athens Quality-of-life" 196 Alps Road Suite 2, Box 305 Athens, Georgia 30606 www.athensfaq.org February 26, 2008

Jamie Johnson Director Office of National Labs Department of Homeland Security 245 Murray Lane SW Building 410 Washington, DC 20528

Re: National Bio and Agro Defense Facility; (NBAF)
Proposed Athens, Georgia location

Dear Mr. Johnson:

I appreciate that you have a difficult, perhaps daunting, job. It is probably an understatement to say that your having to oversee the NBAF site selection process and dependent of what likely would be the world's largest BSL 3 and BSL 4 laboratory, a facility which would experiment, perhaps on an unprecedented scale, with some of the world's deadliest and most virulent pathogens on large animals, while at the same time having to assure reluctant residents of the targeted communities that such a facility would make a benign and beneficial neighbor which neither degrades the environment nor poses a risk to public health or safety, can't be easy.

The purpose of this letter is to suggest how to make your load a little lighter, make your work a bit easier. It's simple: <u>Take Athens, Georgia off the short list of potential NBAF sites.</u>

As I mentioned during our brief visit before the DHS-sponsored meeting in Athens on February 19, most informed citizens of Athens and surrounding communities do not want NBAF (or anything like it) in their midst, so close to one of our scarce our water sources, the Oconee River, our Botanical Garden, our schools, churches and neighborhoods. The DHS site selection process is seriously flawed, as is the DHS community comment process. DHS claims the public comment period is over, but you are just now coming to our community to host a public forum and answer questions about NBAF. Then, when we ask questions as we did on February 19th, we do not get definitive answers. Instead, we get mere speculations about what NBAF would bring to Athens, with comparisons to Plum Island when those comparisons are favorable, and non-specific statements about the safety of new technology (presumably superior to Plum Island's) when those comparisons are unfavorable. Just now the community is learning that NBAF was invited to Athens without community or community government input. Just now the

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WD0571

community is learning about the environmental hazards and potential health risks NBAF will bring to town. And now DHS refuses to formally consider our comments and questions for the record. This is wrong. FAQ inc "For Athens Quality-of-life" requests that you re-open the public comment period for the record, and that DHS specifically include in the public record a copy of the video of the February 19 meeting, along with copies of the unedited versions of the written questions from the community that were selected to be asked as well as copies of all those questions that were not selected to be asked or answered at that meeting.

We know that "community acceptance" is an important component of what DHS must consider when making its final choice for the NBAF site. Regardless of what may have been represented to DHS in its dealings with the Georgia Consortium, "community acceptance" has not been achieved, or even sought, by those who are promoting NBAF for Athens. Further, our Mayor's letter of recommendation given in March 2006, the only apparent indicia of community acceptance in the Georgia Consortium's proposal to locate (all other letters of recommendation were from persons or entities with a financial or other "stake" in NBAF being located in Athens), was a "freelance" undertaking by her without formal action by the Athens/Clarke County Commission or any public forum. Thus, her letter was not a valid indication of community acceptance.

The Georgia proposal to locate was submitted before any information about NBAF had been made available to the public other than a misleading, puffed up February 2006 press release from the Georgia Governor's office that contained wildly exaggerated claims of economic impact (up to \$6 billion over 20 years). That exaggeration, touted by UGA officials for over 18 months, was pure wishful thinking. The belated launch of the UGA/NBAF website in February 2007 further touted the exaggerated economic claims until September 2007, when my wife, Kathy Prescott, and I met with David Lee of UGA (along with other representatives of UGA). At that meeting we asked for the assumptions upon which such remarkable numbers were based. A new report was then hastily prepared by UGA's Carl Vinson Institute of Government that projected, not \$6 billion, but \$1.5 billion over 20 years, reacting to inquiries from my wife, Kathy Prescott and me. We ultimately co-founded FAO "For Athens Quality-of-life", the non-profit citizens' organization I co founded with my wife, Kathy Prescott, It was not until January 2008, after more urging from us, that UGA published the report on its website and quietly explained that the earlier projected figures were based on "best guesses" made in 2006 when they allegedly had no DHS-provided information (although the DHS-provided information which UGA waited 18 months to use in its economic projections had been available to UGA since February 2006—we have a dated copy of being furnished to UGA). Further, we have recently learned from experts FAO has consulted that the economic model used to predict even the lesser economic estimate published by UGA late last year leaves out many important factors necessary to be a legitimate predictor of economic impact.

During my time as an enforcement lawyer in Washington, D.C. with the Securities and Exchange Commission, such gross misrepresentations in connection with the sale of a security would have warranted a criminal prosecution. After 38 years policing clients'

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WD0571

disclosures as a securities and corporate lawyer, I am frankly astonished that the continuous misrepresentation and manipulation of material facts regarding something as serious as a huge, potentially deadly bio-terror laboratory, would be considered proper tactics by its proponents in furthering the agendas of UGA and/ or DHS. A deceit is a deceit, for whatever purpose, and deceitfulness is made worse when committed by those in whom we have been conditioned to place our trust—such as a vice president of a university or an official of a federal agency. NBAF could turn out to be a far more dangerous lemon than your typically oversold and overrated used car. by those whom we are conditioned to trust, such as a university or a unit of our government.

Because of the disingenuous information being published by UGA and DHS about NBAF, my wife and I undertook to research the NBAF story on our own. Ultimately, we became so disillusioned at the lack of candor and the manipulation of information on the UGA/NBAF website and in the media that in late 2007 we founded FAQ ine "For Athens Quality-of-life". FAQ's initial purpose was to inform the uniformed or badly informed Athens community of the true complexity of the issues that surround NBAF, issues that UGA and DHS had been unable or unwilling to answer in a forthright manner. Even the answers that were given by UGA and DHS often changed over time as, to use UGA's terminology, DHS "refined" its concept of NBAF. The more the people became aware of what NBAF was really all about, the more the community became informed, then the more we became convinced in our opposition to NBAF. Our opposition has been further provoked by learning that the actual community had been excluded by the Georgia Consortium from the NBAF invitation process, even though DHS named "community acceptance" as on of DHS's four principal criteria for locating NBAF.

In my personal conversationmmunication with you last Tuesday night, I confirmedalso mentioned that FAQ and the grass-roots community haveis prepared and are poised for a vigorous and unrelenting fight by all legal means to prevent NBAF from being imposed upon the community of Athens. It is imperative that DHS follow the letter of the law in reviewing the impacts this facility will have on Athens. All citizens' concerns must be heard by DHS and thoroughly evaluated and reviewed on the record by the appropriate DHS officials in compliance with all applicable laws.

I did enjoy the brief visit with you on February 19, and I respect you as a person and for your service to our government. But I hope you will take seriously our resolve to keep NBAF away from Athens. If the EIS is done properly, I know you will find that there will be serious adverse environmental impacts from the construction and operation of the facility in Athens, and that there is the potential for devastating impacts, in terms of animal health, human health, and economics from the possible spread of foreign animal diseases from this facility. If the EIS is not done properly and fails to lead NBAF away from our fair city, please be aware that we will take all lawful necessary actions in response.

Sincerely,

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	WD0571	
Grady Thrasher Co-founder, FAQ inc "For Athens Quality-of-life"		

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WD0586 From: Grady Thrasher, III Sent: Sunday, August 24, 2008 12:06 PM NBAFProgramManager Subject: FW: letter to whomever re: NBAF Dear NBAF Program Manager, Please be sure that the following letter to our Mayor is included in the record of NBAF DEIS comments from Athens, GA. Thank you. ----Original Message----From: Director, FAQinc [mailto:director@athensfaq.org] Sent: Thursday, August 14, 2008 7:58 AM To: keb Cc: Grady Subject: Re: letter to whomever re: NBAF Dear Mr. Bussell. This is one of the most well reasoned, intelligently articulated letters that I have seen concerning NBAF. It is so chocked full of information and good points that I hope you will make this a comment today at one of the two meetings or at least send it to the NBAF Program Manager before August 25. Thank you so very much! Kathy Prescott Co-founder of FAQ On Aug 14, 2008, at 7:35 AM, k e b wrote: > Dear Mayor Heidi Davison: > The National Bio-and Agro-Defense Facility (NBAF) proposed by the 1| 15.2 > Department of Homeland Security (DHS)would degrade our fragile environment, strain our small town infrastructure and impose serious > and unwanted public health and safety risks on our community. > I worked for the Federal Government for over 25 years and can tell 2 2.0 > you that you will NOT know what is being tested at the NBAF. When > DHS is asked "...what are you testing there..." they will say

Comment No: 1 Issue Code: 15.2

DHS notes the commentor's concern. The potential costs for building additional infrastructure would vary with the location and would depend on the capacity of the existing infrastructure to supply the proposed NBAF. Funding for the design, construction, and operations for the NBAF will come from the Federal Government. Proposals for offsets to the site infrastructure (part of the construction costs) were requested by the Federal government. The decision as to what to offer (land donation, funding, other assets) is solely at the discretion of the consortium, state and local officials as part of the consortium bid site package. The amount of funding and how the funding is paid for (bonds, taxes, etc.) is determined by the state and local government officials and not the decision of the Federal government.

Comment No: 2 Issue Code: 2.0

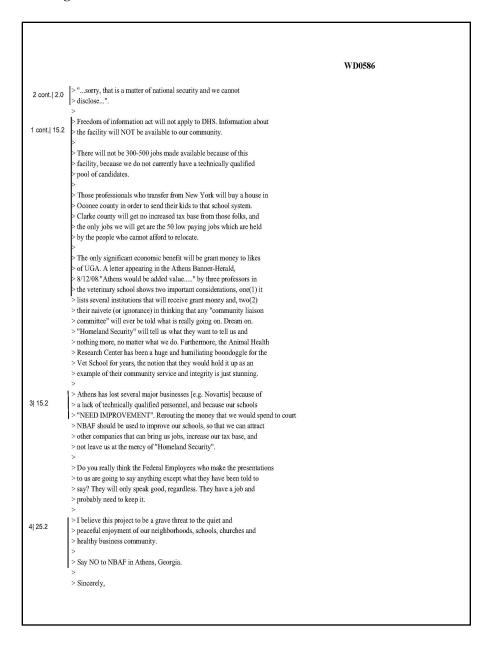
DHS notes the commentor's statement. Procedures and plans to operate the NBAF will include the Institutional Biosafety Committee, which will include community representatives as described in Section 2.2.2.6 of the NBAF EIS. Should a decision be made to build NBAF and the site selected, DHS would begin transition and operational planning which would include consideration of policies and procedures for public participation, education, and also public advisory initiatives. After DHS determines the viability and nature of such a public advisory and oversight function, appropriate roles and responsibilities would be defined. DHS notes the commentor's concern that all possible pathogens to be studied at the NBAF are not listed in the NBAF EIS. The pathogens to be studied at the NBAF as provided in Chapter 2, Section 2.2.1 of the NBAF EIS include Foot and Mouth Disease virus, Classical Swine Fever virus, Vesicular Stomatitis virus, Rift Valley Fever virus, Nipah virus, Hendra virus, and African Swine Fever virus. Should the NBAF be directed to study any pathogens not included in the list of pathogens included in the NBAF EIS, DHS and USDA would conduct an evaluate of the new pathogen(s) to determine if the potential challenges and consequences were bounded by the current study. If not, a new risk assessment would be prepared and a separate NEPA evaluation may be required.

Comment No: 4 Issue Code: 25.2

DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

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Comment No: 3 Issue Code: 15.2

DHS notes the commentor's concern. Regarding the rerouting of local funding to schools instead of for the proposed NBAF, DHS does not have control over how the consortium, state and local officials use funding. The economic effects of the NBAF at the South Milledge Avenue Site are included in Section 3.10.3. Operations and maintenance of the facility and household spending by its employees generates a positive economic impact. In addition, research facilities typically stimulate the formation of other high tech establishments in the surrounding region and can serve as engines of economic growth. This type of economic growth will provide employment opportunities that can be filled by the local labor force with the appropriate technical training from educational institutions within the region.

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